

DIRECTOR, FBI

~~CONFIDENTIAL~~

5/17/74

(S)

SAC, SACRAMENTO

(P)

(U)

VISIT OF SOVIET OFFICIALS
TO GOVERNOR RONALD REAGAN,
SACRAMENTO, CALIFORNIA,
5/25/74

(S)

3-27-96
CLASSIFIED BY: SSA9803RDD/bac
REASON: 1.5 (d)
DECLASSIFY ON: X 6
(405,193)

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED EXCEPT
WHERE SHOWN OTHERWISE.

b1

(U)

On 5/14/74, EDWARD HICKEY, Chief of Security
for Governor RONALD REAGAN, Sacramento, advised that the
following Soviet officials were due to arrive at Sacramento
on 5/25/74: (S)

(S)



- 2 - Bureau
- 1 - San Francisco (Info)
- 2 - Sacramento

TPG:epg

(5)

Classified Document C

~~CONFIDENTIAL~~

Classified by 978
Exempt from GDS, Category 3
Date of declassification: Indefinite

Ronald Reagan-3880

~~SECRET~~

Griffin RB

(S)

~~CONFIDENTIAL~~

SC

(S)

~~SECRET~~



~~(S)~~

b1

(U)

HICKEY advised that this group is traveling from San Francisco on 5/25/74, and intend to stop at the Nut Tree along Interstate 80. If they have time they will visit the University of California-Davis (UCD) campus and expect to arrive at the Governor's Office at the Capitol at 3:00 p.m. and thereafter at 4:00 p.m., they have been invited to a cocktail party at the Governor's residence. ~~(S)~~

(U)

The above names were the only names furnished by the Governor's Office, but Mr. HICKEY advised there would probably be about 20 people in the visiting group. ~~(S)~~

(U)

The Bureau is requested to advise if their records show any pertinent information concerning the above individuals.

An information copy is being furnished San Francisco [since the group is supposed to originate travel from that division.] ~~(S)~~

LEADS:

SACRAMENTO:

AT SACRAMENTO, CALIFORNIA:

Will follow through established sources and advise of any pertinent information.

~~CONFIDENTIAL~~

EXEMPTED FROM AUTOMATIC
DECLASSIFICATION
AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
EXEMPTION CODE 25X(1)
DATE 03-18-2009

Per OGA letter dated 3-9-2009

F B I

Date: 8/22/70

Transmit the following in PLAINTEXT
(Type in plaintext or code)

~~SECRET~~

Via TELETYPE URGENT
(Priority)

TO: DIRECTOR, FBI AND SAC, LOS ANGELES

FROM: SAC, SACRAMENTO (175-NEW)

3-12-96
CLASSIFIED BY SSA9803RDD/JAC
DECLASSIFY ON: 25X 1
(405,193)

UNSUB; ^S THREATS AGAINST THE LIVES OF THE PRESIDENT OF THE UNITED STATES AND GOVERNOR, STATE OF CALIFORNIA.

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED EXCEPT
WHERE SHOWN OTHERWISE.

ASAC ROBERT BURKE, U.S. SECRET SERVICE PAREN USSS PAREN,
SACRAMENTO, CALIFORNIA, ADVISED THIS DATE THAT CALIFORNIA STATE
DEPARTMENT OF CORRECTIONS, TELEPHONICALLY ADVISED THEIR AGENCY
ON THE NIGHT OF AUGUST TWENTY-ONE, SEVENTY, ~~THAT THEY~~ HAD
INTERCEPTED TWO LETTERS, WHICH RELATED INFORMATION OF POSSIBLE
SIMULTANEOUS ATTACKS UPON THE LIVES OF PRESIDENT NIXON AND
GOVERNOR REAGAN.

USSS INVESTIGATION REFLECTS ONE [REDACTED] WMA,
BORN [REDACTED] OKLAHOMA. FBI

b1
b6
b7C

[REDACTED] PRESENTLY INCARCERATED FOLSOM
(S) STATE PRISON, WROTE TWO LETTERS, [REDACTED]

JES/azl

Approved: *[Signature]*

Special Agent in Charge

Sent

330/1345/P

Per

Ronald Reagan-3994

SEARCHED

INDEXED

SERIALIZED

FILED

~~(S)~~

SC 175-NEW

PAGE TWO

LETTER

~~SECRET~~

THE SECOND LETTER TO GOVERNOR REAGAN. STATES THAT HE OVERHEARD
FIVE OR SIX BLACK INMATES DISCUSSING THE PROPOSED PLAN OF
ASSASSINATION OF
SIMULTANEOUS ~~ATTACKS~~ UPON PRESIDENT NIXON AND GOVERNOR REAGAN.

THE ATTEMPT ON PRESIDENT NIXONS LIFE TO TAKE PLACE UPON HIS RETURN
TO THE WESTERN WHITE HOUSE FROM MEXICO.

[REDACTED]

[REDACTED]

~~(S)~~

ASAC BURKE STATES THEY HAVE ALERTED WASHINGTON D.C.,
PRESIDENT NIXONS AND GOVERNOR REAGANS STAFFS. BURKE WILL
KEEP SACRAMENTO ADVISED.

b1

ABOVE FOR INFORMATION OF BUREAU AND LOS ANGELES IN ~~VIEW~~ ^{VIEW}
OF SECRET SERVICE HANDLING.

END.

~~SECRET~~

Ronald Reagan-3995

UNITED STATES GOVERNMENT

Memorandum

EXEMPTED FROM AUTOMATIC
DECLASSIFICATION
AUTHORITY DERIVED FROM:
FBI AUTOMATIC DECLASSIFICATION GUIDE
EXEMPTION CODE 25X(1)
DATE 03-18-2009

TO : SAC, SACRAMENTO (175-1EW)

DATE: 8/22/70

FROM : NIGHT CLERK, MICHAEL HARMON

SUBJECT: UNSUBS; THREATS AGAINST THE LIVES OF THE PRESIDENT OF THE
UNITED STATES AND GOVERNOR, STATE OF CALIFORNIA.

RE SACRAMENTO TELETYPE TO THE DIRECTOR AND LOS ANGELES.

b6
b7C

Special Agent Jack Edwards, U. S. Secret Service, contacted this office instant date re [REDACTED] SA Edwards advised that the Folsom State Prison files concerning [REDACTED] do not show any previous events similiar to the letters or their contents. SA Edwards also stated that there was no record suggesting that [REDACTED] has a mental problem.

SA Edwards further advised that [REDACTED]

b1

SA Edwards stated that further contact by his agency with [REDACTED] would be delayed because prison officials that frequent visits to an inmate by federal agents can endanger an inmate's life.

b6
b7C

SA Edwards requested writer inform SA Shedd of the above information.

SA Shedd advised of the above this date.

The above information being forwarded to the appropriate Supv. for any action deemed necessary.

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED EXCEPT
WHERE SHOWN OTHERWISE.

2- Sacramento
MEH/meh

175-28-2

SEARCHED	INDEXED
SERIALIZED	FILED
AUG 22 1970	
FBI - SACRAMENTO	

Ronald Reagan-3996



UNITED STATES GOVERNMENT

Memorandum

TO : SAC, Sacramento

DATE: August 25, 1970

FROM : Director, FBI

SUBJECT: UNSUBS; THREATS AGAINST THE
LIVES OF THE PRESIDENT OF THE
UNITED STATES AND GOVERNOR,
STATE OF CALIFORNIA

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED

DATE 3-12-96 BY SSA9803RDD/DAC
(405,193)

Reurtel 8-22-70.

While it is realized in many cases that the differentiation of responsibility between a threat against the President matter handled by Secret Service and a Presidential Assassination Statute case falling under our investigative jurisdiction is a fine one. It is felt in this instance that the case might very well have been handled as a Presidential Assassination Statute case.

Receiving offices should insure that when information is received indicating a possible violation of the Presidential Assassination Statute that immediate investigation is instituted and handled according to existing Bureau instructions. Of course, Secret Service locally should be immediately advised that we are instituting investigation to determine if a violation of the Presidential Assassination Statute has occurred.

2 - Los Angeles

STRIPPED AND CONSOLIDATED
DATE 6-16-71 BY ds

Ronald Reagan-3997

175-28-3

SEARCHED <u>ll</u>	INDEXED <u>ll</u>
SERIALIZED <u>ll</u>	FILED <u>ll</u>
AUG 28 1970	
FBI — SACRAMENTO	



UNITED STATES GOVERNMENT

Memorandum

TO : SAC (175-37)(C)

DATE: 1/28/72

FROM : SA THOMAS P. GRIFFIN

SUBJECT: UNSUB; Threat to Kill
Governor RONALD REAGAN of California
THREAT AGAINST THE PRESIDENT
OO: SC

All necessary action has been taken and this case should be closed.

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-13-96 BY SSA9803RDD/JAC
(405,193)

FILE STRIPPED

DATE 2/2/72 INITIALS *da*

TPG:epg
(1) *epg*

Close

175-37-5

SEARCHED	INDEXED
SERIALIZED	FILED
FBI - SACRAMENTO	

Ronald Reagan-3786



F B I

Date: 12/6/71

Transmit the following in _____
(Type in plaintext or code)

AIRTEL

AIRMAIL

Via _____
(Priority)

TO : DIRECTOR, FBI (62-109276)
FROM : SAC, SEATTLE (62-2635) (RUC)
SUBJECT: UNSUB;
THREAT TO KILL GOVERNOR
RONALD REAGAN OF CALIFORNIA,
THREAT AGAINST THE PRESIDENT
OO: SACRAMENTO

Summary NI

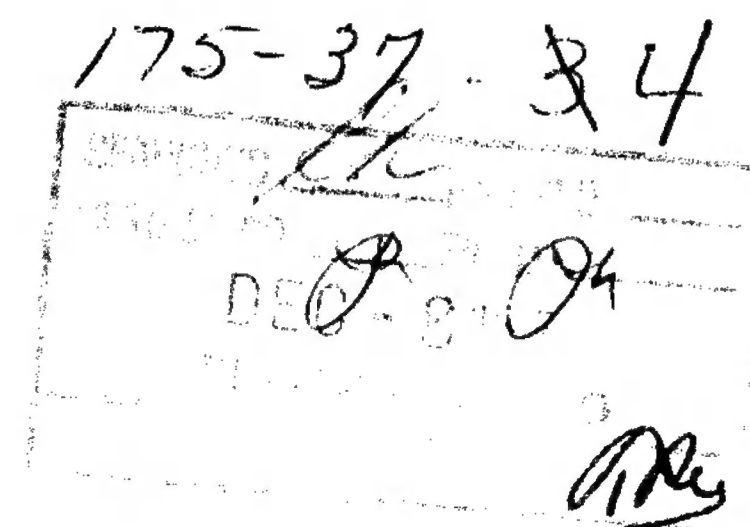
ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-13-96 BY SSA9803RDD/JAC

Enclosed for the Bureau are ten (10) copies of an LHM including one (1) for the Secret Service with an FD 376 attached, and three (3) for Sacramento. No need appears for classifying the LHM.

Seattle ASAC telephoned SA RON STAMP, Sacramento Division, FBI, at about 7:30 a.m., and furnished him the attached information. SA STAMP stated he would advise the Governor's Office promptly.

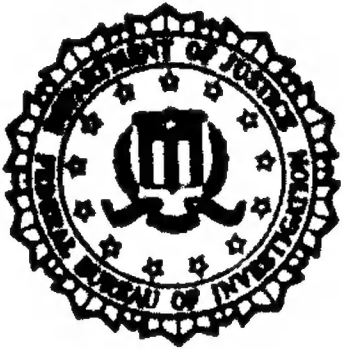
No further action being taken at Seattle, UACB.

2 - Bureau (Enc. 10)
2 - Sacramento (Enc. 3)
1 - Seattle
RBC:mlc
(5)



Approved: _____
Special Agent in Charge

Sent _____ Ronald Reagan-3787
M Per _____



UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

In Reply, Please Refer to
File No.

Seattle, Washington

December 6, 1971

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-13-96 BY SSA9803RDD/JAC

RE: UNKNOWN SUBJECT;
THREAT TO KILL GOVERNOR
RONALD REAGAN OF CALIFORNIA

On December 6, 1971, [REDACTED]

[REDACTED] telephonically advised PAUL R. BIBLER, Assistant Special Agent in Charge, Federal Bureau of Investigation, Seattle, Washington, the following:

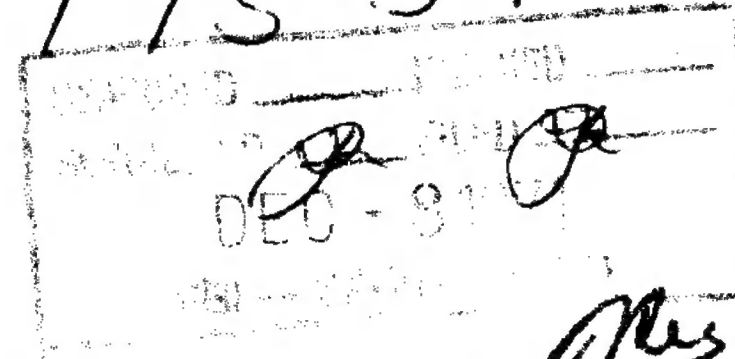
b6
b7C
b7D

At 6:27 a.m., Pacific Standard Time, December 6, 1971, [REDACTED] received a telephone call from an unidentified male who stated he was [REDACTED]

[REDACTED] from California. He stated he was a member of an organized group who intended to kill RONALD REAGAN at a meeting in Sacramento City Hall on Tuesday, December 7, 1971, at twelve noon. He stated, "This is not a crank call," and if the proper precautions were not taken, this mishap would occur. He hung up and called back within minutes to repeat this was not a crank call, "It will happen and I do not want to see him die."

This information was furnished telephonically to WAYNE WELCH, Secret Service, Seattle, by SA R. BERT CARTER at 9:35 a.m., this date and to the Sacramento FBI Office for referral to the Governor's Security Office in Sacramento.

- 1* -



Ronald Reagan-3788

1cc
to Secret Service
Sacto 12/8/71
JAC

F B I

Date: 12/6/71

CODED

Transmit the following in _____
(Type in plaintext or code)

TELETYPE

URGENT

Via _____
(Priority)ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-13-96 BY SSA 9803 RDD/JAC
(405,193)

PER G-1

5549803 RDD/JAC

9:53 AM

TO DIRECTOR AND NEW YORK

RECEIVED IN COMMUNICATIONS

FROM SACRAMENTO (175-NEW)

ALLEGED PLANNED ASSASSINATION OF GOVERNOR RONALD REAGAN, STATE OF
CALIFORNIA, DEC. SEVEN, NEXT, SACRAMENTO, CALIF.b6
b7C
b7D

ON INSTANT DATE, ASAC PAUL BIBLER, SEATTLE, ADVISED

RECEIVED A CALL AT SIX TWENTYSEVEN

AM, INSTANT DATE, FROM UNSUB WHO SAID HE WAS

FROM CALIF. HE STATED HE WAS MEMBER OF

ORGANIZED GROUP WHICH INTENDED TO KILL RONALD REAGAN AT MEETING ^{IN} SACRAMENTO CITY HALL, AT NOON, TUESDAY, DEC. SEVEN, NEXT. HE SAID IT WAS NOT A CRANK CALL AND IF PROPER PRECAUTIONS WERE NOT TAKEN, REAGAN WOULD BE KILLED. CALLER SAID HE WAS AFRAID CALL WOULD BE TRACED AND HUNG UP, BUT CALLED BACK IN FEW MINUTES STATING HE WANTED TO BE SURE THEY DID NOT THINK CALL WAS CRANK CALL.

SGT. PERKINS, SECURITY STAFF FOR GOVERNOR RONALD REAGAN, WAS ADVISED OF ABOVE INSTANT DATE AND ADVISED GOVERNOR IS IN LOS ANGELES PREPARING FOR TRIP TO NEW YORK INSTANT DATE. HE ADVISED GOVERNOR

END PAGE ONE.

1- Seattle (RM)

1- Sacramento

TPG:epg

Approved: _____

(2)

Special Agent in Charge

Sent

WA-10:47 AM

Per

SEARCHED

INDEXED

SERIALIZED

FILED

Ronald Reagan-3789

U.S. GOVERNMENT PRINTING OFFICE: 1971-413-135

F B I

SC 175-NEW

Date:

Transmit the following in _____
(Type in plaintext or code)Via _____
(Priority)

PAGE TWO

WOULD ARRIVE KENNEDY AIRPORT, NEW YORK, VIA AMERICAN AIRLINES AT EIGHT FIFTYTHREE PM AND PROCEED TO WALDORF-ASTORIA HOTEL. ON DEC. SEVEN, NEXT, HE WOULD BE ATTENDING PRIVATE LUNCHEON AT ST. REGIS HOTEL AT TWELVE FIFTEEN PM AND WOULD THEN RETURN TO WALDORF WHERE HE WOULD STAY UNTIL DEPARTURE FOR CALIF. DEC. EIGHT, NEXT, AT NINE AM.

SGT. PERKINS ADVISED HE WOULD NOTIFY GOVERNOR'S CHIEF OF SECURITY, ED HICKEY, WHO IS TRAVELING WITH GOVERNOR.

ADMINISTRATIVE

ABOVE FOR INFO OF NEW YORK IN EVENT ASSISTANCE REQUESTED BY GOVERNOR REAGAN.

END.

Ronald Reagan-3790

Approved: _____

Special Agent in Charge

Sent _____ M Per _____

NR002 SE PLAIN

10:35AM URGENT 12/6/71 VAB

TO DIRECTOR (62-109276) (ATTN: DOMESTIC INTELLIGENCE DIVISION)

SACRAMENTO

FROM SEATTLE (62-2635)

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED PER G-1
DATE 3-13-96 BY SSA 9803 RDD/JAC
(405,193)

UNSUB; THREAT TO KILL GOVERNOR RONALD REAGON OF CALIFORNIA THREAT
AGAINST THE PRESIDENT.

[REDACTED] FURNISHED THE FOLLOWING
INFORMATION TELEPHONICALLY TO THE SEATTLE FBI OFFICE DECEMBER SIX
LAST.

b6
b7C
b7D

AT SIX TWENTYSEVEN A.M., PST, THIS DATE, [REDACTED]

[REDACTED] RECEIVED A CALL FROM AN UNIDENTIFIED MALE WHO SAID HE WAS AN
[REDACTED]

FROM CALIFORNIA. HE SAID HE WAS A MEMBER OF AN ORGANIZED GROUP WHO
INTENDED TO KILL RONALD REAGON AT A MEETING IN SACRAMENTO CITY HALL
ON TUESDAY, DECEMBER SEVEN NEXT, AT TWELVE NOON. HE STATED QUOTE
THIS IS NOT A CRANK CALL UNQUOTE AND IF THE PROPER PRECAUTIONS WERE
END PAGE ONE

175-37-1
100

SEARCHED	INDEXED
SERIALIZED	FILED
DEC 6 1971	
FBI - SACRAMENTO	

[Signature]

Ronald Reagan-3791

• PAGE TWO

62-2635

NOT TAKEN, THIS MISHAP WOULD OCCUR. HE HUNG UP AND CALLED BACK WITHIN MINUTES TO REPEAT THIS WAS NOT A CRANK CALL QUOTE IT WILL HAPPEN AND I DO NOT WANT TO SEE HIM DIE. UNQUOTE.

THIS INFORMATION WAS FURNISHED TELEPHONICALLY TO WAYNE WELCH, SECRET SERVICE, SEATTLE, BY SA R. BERT CARTER AT NINE THIRTYFIVE A.M. THIS DATE AND TO THE SACRAMENTO FBI OFFICE FOR REFERRAL TO THE GOVERNOR'S SECURITY OFFICE IN SACRAMENTO.

ADMINISTRATIVE: INFORMATION WAS FURNISHED BY SEATTLE ASAC TO SA RON STAMP, SACRAMENTO, AT ABOUT SEVEN THIRTY A.M. AND HE SAID HE WOULD ADVISE THE GOVERNOR'S OFFICE PROMPTLY. LHM FOLLOWS. P.
END

VLS

FBI SACRAMENTO

CLR

Ronald Reagan-3792

F B I

Date: 6/26/72

Transmit the following in PLAIN
(Type in plaintext or code)Via NITEL
(Priority)

TO: ACTING DIRECTOR, FBI

FROM: SAC, SACRAMENTO (175-new) (P)

SUBJECT:

UNSUBS (2); THREAT AGAINST CALIFORNIA
GOVERNOR RONALD REAGAN, SACRAMENTO,
CALIFORNIA, JUNE 26, 1972
THREAT AGAINST PUBLIC OFFICIAL
(OO: SC)

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-13-96 BY SSA 9803RDD/SAC

(405,193)

AT THREE THIRTY PM. JUNE TWENTY-SIX INSTANT, [REDACTED]
[REDACTED], ORAGNEVALE, CALIFORNIA ADVISED

WAS IN MEN'S SECTION WEINSTOCK'S DEPARTMENT STORE, SACRAMENTO
EARLIER TODAY AND OVERHEARD TWO WHITE MALES DISCUSSING OBTAINING
RIFLE IN CONNECTION WITH GOVERNOR REAGAN AND QUOTE GET HIM ON
FOLSOM BLVD WHEN HE LEFT HIS HOUSE END QUOTE. ALSO MENTIONED
CONTRACT FOR THE JOB HAD BEEN OBTAINED. UNSUBS DESCRIBED AS
WELL-DRESSED. ONE WAS ^{quote} MAFIA TYPE, ^{unquote} FORTY FIVE YEARS, SHORT, HEAVY
BUILD WHO DROVE NEW CADILLAC BROUGHM SEDAN WITHOUT PLATES. OTHER
UNSUB ALSO MID-FORTIES, WHITE SHIRT AND TIE WHO MAY HAVE BEEN
SALESMAN IN SHOPPING CENTER WHERE WEINSTOCK'S LOCATED.

b6
b7c

[REDACTED] STATED UNSUBS APPEARED TO BE RESPONSIBLE PROFESSIONAL
PERSONS WHO MET FOR ABOUT FIFTEEN MINUTES AND APPEARED HAVE NO
INTEREST IN SHOPPING.

SEARCHED INDEXED
SERIALIZED FILED

WAW:waw

Ronald Reagan-2739

Approved: 

Special Agent in Charge

Sent 7/27 6:54 PM

M

Per 

WA-943

U. S. GOVERNMENT PRINTING OFFICE: 1971-413-135

F B I

Date:

Transmit the following in _____
(Type in plaintext or code)Via _____
(Priority)

FOLLOWING PERSONS ADVISED OF ABOVE BY SA WILLIAM A. WIGHTMAN:
ED HICKEY, SECURITY SECTION, OFFICE OF GOVERNOR REAGAN AT FOUR
TEN PM AND CAPT. JERRY FINNEY, DETECTIVE DIVISION, SACRAMENTO PD
AT FOUR TWENTY TWO PM. THOSE ADVISED BY SC GERALD WAYNE CANNEDY
WERE LT. FRANCIS WALLACE, SACRAMENTO COUNTY SO AT FOUR FIFTEEN PM
AND SAC DOUG DUNCAN, U.S. SECRET SERVICE, SACRAMENTO AT FOUR THIRTY-
TWO PM, ALL ON JUNE TWENTY-SIX.

b6
b7CADMINISTRATIVE

COMPLAINANT REQUESTED BY ED HICKEY TO APPEAR AT OFFICE
OF GOVERNOR REAGAN AT FIVE PM TO DISCUSS POSSIBLE ACTION TO BE
TAKEN IN THIS MATTER. GOVERNOR'S OFFICE AND SACRAMENTO PD WILL
SHARE JURISDICTIONAL INTEREST.

LHM FOLLOWS. END.

-2-

Ronald Reagan-2740

Approved: _____ Sent _____ M Per _____
Special Agent in Charge

Sacramento, California
July 27, 1972

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-13-96 BY SSA 1802 RDD/JAC
(405,193)

UNKNOWN SUBJECTS (2);
Threat Against California
Governor RONALD REAGAN
Sacramento, California
June 26, 1972

At approximately 3:30 pm, June 26, 1972, [redacted]
[redacted] Orangevale, California,
who is unemployed, contacted the Sacramento Office of the
Federal Bureau of Investigation, and furnished the following
information:

[redacted] stated that earlier in the afternoon of
June 26, 1972, he had been browsing in the men's clothing
section of Weinstock's Department Store, Country Club
Center, Sacramento, California, and overheard two white
males discussing possibly obtaining a rifle in connection
with California Governor Ronald Reagan and were heard to
state they would "get him on Folsom Boulevard when he left
his house." One of these persons also allegedly stated
that "the contract for the job had been obtained."

b6
b7C

[redacted] continued that he was obscured from visual
contact with these two persons during their meeting which
lasted about fifteen minutes and could only hear random
portions of their remarks. He said that they appeared to
be responsible, well-dressed professional persons who
seemed to have no interest in shopping. [redacted] described
these persons as follows:

This document contains neither recommendations nor conclusions of the
FBI. It is the property of the FBI and is loaned to your agency; it
and its contents are not to be distributed outside your agency.

5 - Bureau
1 - USSS, SC
2 - Sacramento (1 - 175-45) (1 - 66-21A)
WAW/grh (8)
Ronald Reagan-2741

RE: UNKNOWN SUBJECTS (2); Threat Against
California Governor RONALD REAGAN

Suspect Number One

Sex	Male
Race	Caucasian
Age	45 years
Height	5 feet 10 inches
Weight	230
Build	Heavy
Complexion	Olive
Hair	Short, black, curly, gray at temples
Appearance	"Typical Mafia" dress, expensive charcoal suit, blue dress shirt and tie

Suspect Number Two

Sex	Male
Race	Caucasian
Age	Middle forties
Height	5 feet 10 inches
Weight	175 - 180
Build	Medium
Complexion	Medium
Dress	Dark slacks, gray dress shirt and tie

concluded by stating that unknown male number one left Weinstock's Department Store and drove away in a 1971 or 1972 powder blue Cadillac Brougham with no visible license plate, either permanent or temporary.

b6
b7C

The following persons were notified of the above information on June 26, 1972.

RE: UNKNOWN SUBJECTS (2); Threat Against
California Governor RONALD REAGAN

<u>Time</u>	<u>Person Notified</u>
4:10 pm	Ed Hickey Director of Security Office of the California Governor Ronald Reagan
4:15 pm	Lieutenant Francis Wallace Sacramento County Sheriff's Office
4:22 pm	Captain Jerry Finney Detective Division Sacramento Police Department
4:32 pm	Special Agent in Charge Douglas Duncan Sacramento Office United States Secret Service

On June 27, 1972, Ed Hickey, supra, advised that he subsequently determined through the Sacramento Police Department that the complainant in this matter, [REDACTED] [REDACTED] has been known in the past to have fabricated false stories of possible crimes or plots and has a "detective complex."

b6
b7C

July 27, 1972

Director
 United States Secret Service
 Department of the Treasury
 Washington, D. C. 20220

ALL INFORMATION CONTAINED

HEREIN IS UNCLASSIFIED

DATE 3-13-96 BY SSA 9803 RDD/JAC
(405,193)

RE:

UNKNOWN SUBJECTS (2)**Threat Against California Governor****RONALD REAGAN, June 26, 1972**

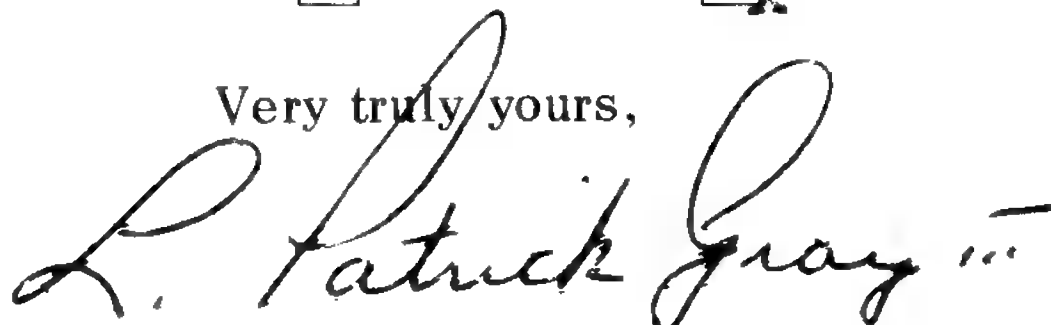
Dear Sir:

The information furnished herewith concerns an individual or organization believed to be covered by the agreement between the FBI and Secret Service concerning protective responsibilities, and to fall within the category or categories checked.

1. ☐ Threats or actions against persons protected by Secret Service.
2. ☐ Attempts or threats to redress grievances.
3. ☐ Threatening or abusive statement about U. S. or foreign official.
4. ☐ Participation in civil disturbances, anti-U. S. demonstrations or hostile incidents against foreign diplomatic establishments.
5. ☐ Illegal bombing, bomb-making or other terrorist activity.
6. ☐ Defector from U. S. or indicates desire to defect.
7. ☒ Potentially dangerous because of background, emotional instability or activity in groups engaged in activities inimical to U. S.

Photograph ☐ has been furnished ☐ enclosed ☒ is not available.

Very truly yours,



L. Patrick Gray, III
 Acting Director

2 - Bureau

1 - Special Agent in Charge (Enclosure(s))
 U. S. Secret Service , **Sacramento**

Enclosure(s)

(Upon removal of classified enclosures, if any, this transmittal form becomes UNCLASSIFIED.)

1 - **Sacramento (175-45)**

WAW/grh

(4)



Ronald Reagan-2744

175-45-0



ACTING DIRECTOR, FBI

July 27, 1972

SAC, SACRAMENTO (175-45) C

UNKNOWN SUBJECTS (2);
Threat Against California
Governor RONALD REAGAN
Sacramento, California
June 26, 1972
THREAT AGAINST PUBLIC OFFICIAL

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 3-13-96 BY SSA9803RDD/JAC
(405,193)

00 - Sacramento

Re Sacramento nitel to Acting Director 6/26/72.

Enclosed for the Bureau are five copies of a
letterhead memorandum dated and captioned as above.

FD-376 is attached hereto and a copy of this
letterhead memorandum has been disseminated to United States
Secret Service locally.

Complainant [redacted] was interviewed by
SA WILLIAM A. WIGHTMAN and was subsequently referred
directly to ED HICKEY, Director of Security, Office of
Governor REAGAN, who also interviewed [redacted] at about 5:30 pm
on June 26, 1972.

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b7C

SA WILLIAM A. WIGHTMAN notified ED HICKEY, supra,
and Captain JERRY FINNEY, Detective Division, Sacramento
Police Department, of the information in this matter.
SC GERALD WAYNE CANNEDY advised Special Agent in Charge
DOUG DUNCAN, United States Secret Service, and Lieutenant
FRANCIS WALLACE, Sacramento County Sheriff's Office, on
the details in this matter.

No further action is being taken by the Sacramento
Office in this matter.

2 - Bureau (Enc. 5)

1 - Sacramento

WAW/grh

(3)

Ronald Reagan-2745

F B I

Date: 9/6/75

07

Transmit the following in PLAINTEXT
(Type in plaintext or code)Via TELETYPE IMMEDIATE
(Priority)

TO: BUREAU

LOS ANGELES (175-113)

NEW YORK

WFO

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIEDDATE 5/6/96 BY SSA9803 RD/EL
405,193

FROM: SACRAMENTO (175-73) (P)

b6
b7C

[REDACTED] AKA. ASSAULTING THE PRESIDENT.

RE SEATTLE TEL TO BUREAU, SEPTEMBER 5, 1975.

RETEL INDICATED MANSON GIRLS HAD NUMEROUS POLITICAL FIGURES
AS TARGETS FOR ASSASSINATION. SUBSEQUENT INTERVIEW OF [REDACTED]
[REDACTED] AT [REDACTED] INDICATED EX-GOVERNOR OF CALI-
FORNIA RONALD REAGAN, VICE PRESIDENT NELSON ROCKEFELLER, SECRE-
TARY OF STATE HENRY KISSINGER, AND GOVERNOR BROWN OF CALIFORNIA
AMONG THOSE TARGETED BY GROUP.

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INVESTIGATION AND INTERVIEWS IN SACRAMENTO TO DATE HAVE
NOT SUBSTANTIATED ANY THREATS AGAINST SPECIFIC INDIVIDUALS.
THIS HAS BEEN BROUGHT TO ATTENTION OF BROWN OF CALIFORNIA.
RECOMMENDED LOS ANGELES HANDLE NOTIFICATION OF REAGAN'S SECURITY
STAFF. WFO HANDLE NOTIFICATION OF SECURITY STAFFS OF ROCKE-
FELLER AND KISSINGER. FURNISHED FOR INFO NEW YORK.

END.

Ronald Reagan-3248

TPG:smd
(1)Latham
Goffin 27Approved: PCIR
Special Agent in Charge

Sent

M

Per

Sent to all offices
via FBIHQ

175-73-A70

SEARCHED INDEXED
SERIALIZED FILED

F B I

Date: 9/10/75

Transmit the following in _____
(Type in plaintext or code)Via TELETYPE IMMEDIATE
(Priority)

TO: DIRECTOR, FBI
SAN DIEGO
LOS ANGELES (175-113)
FROM: SACRAMENTO (175-73) (P)
ATTENTION: INTD AND GID.

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED

DATE 5/16/96 BY SSA 803 RDD/RL
405,193

FROMFORD

RE LOS ANGELES NITEL SEPTEMBER 9, 1975 AND SAN DIEGO
NITEL SEPTEMBER 9, 1975, REGARDING [REDACTED]

[REDACTED]

CONTACT WITH ROBERT HOOPER, SENIOR SPECIAL AGENT,
CALIFORNIA DEPARTMENT OF CORRECTIONS, AND JOHN CARBONE,
GOVERNOR'S PROTECTION DETAIL, CALIFORNIA STATE POLICE AT
SACRAMENTO, CALIFORNIA, REGARDING THE EXISTENCE OF A LETTER
FROM CHARLES MANSON TO [REDACTED] ADVOCATING THE TORTURE
AND BEHEADING OF THE FAMILY OF FORMER CALIFORNIA GOVERNOR
RONALD REAGAN. UNPRODUCTIVE. CALIFORNIA DEPARTMENT OF
CORRECTIONS MADE CURSORY SEARCH AND INQUIRY AND COULD NOT
LOCATE LETTER. CARBONE REVIEWED MANSON FILE AT HIS OFFICE
AND COULD NOT LOCATE LETTER. INFORMATION WAS DEVELOPED
CONCERNING LOS ANGELES COUNTY SHERIFF'S DEPARTMENT INTERVIEW
SJF/sih (1)

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Approved: [Signature] Ronald Reagan-3249
Special Agent in Charge

Sent WA-7¹³P SD-7¹⁰P LA-7⁴⁰P MPer [Signature]

F B I

Date:

Transmit the following in _____
(Type in plaintext or code)Via _____
(Priority)

SC]75-73 PAGE TWO

OF [REDACTED] OCTOBER 27, 1971. [REDACTED] APPARENTLY
PROVIDED INFORMATION OF A CHARLES MANSON PLOT TO ASSASSINATE
REAGAN [REDACTED] INTERVIEW
WAS CONDUCTED BY DEPUTY GLEASON, HOMICIDE BUREAU, LOS ANGELES
COUNTY SHERIFF'S OFFICE, CASE FILE [REDACTED] AND

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[REDACTED]
DEPUTY RICHARD ADAMS, LOS ANGELES COUNTY SHERIFF'S OFFICE,
ON SPECIAL ASSIGNMENT TO ASSIST SACRAMENTO DIVISION, ADVISED
HE BELIEVED [REDACTED]

[REDACTED] AND INFORMATION OBTAINED DURING INTERVIEW HAD BEEN
RESOLVED.

SAN DIEGO AT SAN DIEGO - PROVIDE THERMOFAX OF ARTICLE
WHICH REPORTEDLY APPEARED IN SAN DIEGO UNION NEWSPAPER
THIS DATE, ATTENTION SA FULLERTON.

LOS ANGELES AT LOS ANGELES - CONTACT DEPUTY GLEASON (SUPRA)
FOR DETAILS REGARDING [REDACTED] MATTER AND ATTEMPT TO DETERMINE
IF IDENTICAL.
END.

Ronald Reagan-3250

Approved: _____
Special Agent in Charge

Sent _____ M Per _____

IMMEDIATE

NR017 SE PLAIN

1157 PM IMMEDIATE SEPTEMBER 5, 1975 GJW

TO DIRECTOR

SACRAMENTO

FROM SEATTLE (175-NEW) (P) 3P

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[REDACTED] AKA; ASSAULTING THE PRESIDENT. 00: SC.

REMYTEL, SEPTEMBER 5, 1975.

[REDACTED] REINTERVIEWED IN DEPTH AT 6:00 PM,
SEPTEMBER 5, 1975, AT [REDACTED] BY
SA ROBERT H. WICK, FBI, AND SA WILLIAM NELSON, U.S. SECRET SERVICE,
SEATTLE. [REDACTED] FURNISHED THE FOLLOWING ADDITIONAL INFORMATION:

HE BELIEVED THE NAME OF THE MANSON GIRL [REDACTED]
[REDACTED] WAS [REDACTED] (LNU). THE REFERENCE TO [REDACTED] AROSE DURING
A DISCUSSION SUBSEQUENT TO OBSERVING A TELEVISION PROGRAM OR
TELEVISION NEWS PROGRAM INWHICH MANSON WAS MENTIONED. THIS PROGRAM
WAS TELCAST SOMETIME BETWEEN AUGUST 22 - 24, 1975 ON AN UNRECALLED
TELEVISION STATION IN SACRAMENTO. [REDACTED] CLAIMED TO [REDACTED]
[REDACTED] AND TALKED WITH HER FOR SEVERAL HOURS, BUT DID NOT
INDICATE THE SPECIFIC DATE THIS OCCURED.

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END PAGE ONE

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 5/6/96 BY SSA9803 RDD/5
405,193

SAC A R
Robinson
Steffen AB

175-73-Sub B-91

SEARCHED	INDEXED
SERIALIZED	FILED
SEP 5 1975	
FBI - SACRAMENTO	

Latham

Ronald Reagan-3251

PAGE TWO

SE 175-NEW

[] RECEIVED IMPRESSION [] HAD KNOWN [] BEFORE []
[] SHE TOLD [] THAT SHE AND TWO OTHER MANSON'S FEMALES WERE
IN THE FORE FRONT OF THE MOVEMENT; THAT THEY HAD BEEN BACK IN
WASHINGTON D.C.; BUT HAD MOVED OUT TO SACRAMENTO WHERE THEY COULD
BE IN CLOSE AND ACTUAL CONTACT WITH MANSON. [] MENTION THE
FEMALES WERE ANXIOUS TO GET SUPPORT FOR THE MOVEMENT AND WERE
SOLICITING SUPPORT ON THE STREETS OF SACRAMENTO. THEY WERE ALSO
GOING TO CAUSE SOME UNSPECIFIED KIND OF TROUBLE IN CALIFORNIA. SHE
SAID THEY STILL HAD THEIR "PURIFICATION LIST" AND IN ADDITION TO
THOSE ENUMERATED IN RETEL STOCKS ADDED THE NAME OF FORMER CALIFORNIA
GOVERNOR RONALD REAGON AS ON THE LIST.

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[] SAID [] MAY STILL BE RESIDING AT []
[] DESCRIBED [] AS A WHITE MALE, 5'11", 140 LBS.,
DARK BROWN LONG HAIR, SHORT CROPED BEARD, USUALLY QUIET AND SOFT
SPOKEN. HE HAS A GIRLFRIEND EMPLOYED AT []
[] NAME UNKNOWN. []

HE HAS A HIGH SCHOOL EDUCATION AND INDICATED THAT HE WOULD RATHER
[] (PHONETIC) MENTIONED

END PAGE TWO

PAGE THREE

SE 175-NEW

IN RETEL IS [REDACTED] IN [REDACTED]
USED DOPE, BUT INDICATED NO SYMPATHY FOR THE MANSON CAUSE. [REDACTED]
SAID [REDACTED] COULD NOT FURNISH ANY INFORMATION REGARDING ANY MEMBERS
OF MANSON CLAN EXCEPT AS SET FORTH ABOVE. [REDACTED] NEVER SAW
[REDACTED] AND HE REPORTED THIS INFORMATION ONLY BECAUSE OF THE ATTEMPT
ON THE PRESIDENTS LIVE TODAY AS A RESULT OF NEWS MEDIA PROGRAMS.

ADMINISTRATIVE:

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BUREAU SHOULD CONSIDER INFORMING FORMER GOVERNOR REAGON OR
HIS STAFF RELATIVE TO HIS BEING NAMED AS A POSSIBLE TARGET OF AN
ASSASSINATION ATTEMPT.

[REDACTED] DID NOT KNOW THE IDENTITY OF ANY OTHER INDIVIDUALS
INCLUDED IN THE "PURIFICATION LIST" MENTIONED BY THE GROUP. [REDACTED]
INDICATED HE WOULD REMAIN IN [REDACTED] FOR TWO - THREE WEEKS AND
WOULD BE AVAILABLE FOR FURTHER INTERVIEWS IF NECESSARY. SECRET
SERVICE, SEATTLE, AWARE OF ALL DETAILS.

E N D

SJP FBI SC CLR

Ronald Reagan-3253

NR013 WA PLAIN 544AM MRF

1:10 AM SEPTEMBER 9, 1975 NITEL SP

TO: DIRECTOR, FBI
LOS ANGELES (175-113)
SACRAMENTO (175-73
SAN FRANCISCO (175-72
PORTLAND
SEATTLE

FROM: SAN DIEGO (175-111) (P) 2P

ATTN: INTD AND GID

FROMFORD. OO: SACRAMENTO

ON SEPTEMBER 8, 1975, [REDACTED]

[REDACTED] TELEPHONICALLY ADVISED THE SAN DIEGO OFFICE

ON A CONFIDENTIAL BASIS [REDACTED]

[REDACTED] APPROXIMATELY

ONE AND ONE-HALF TO FOUR YEARS AGO, CHARLES MANSON, WHILE
IN PRISON, WROTE A LETTER TO [REDACTED] IN WHICH MANSON
ADVOCATED THE TORTURE AND BEHEADING OF THE FAMILY OF FORMER
CALIFORNIA GOVERNOR RONALD REAGAN. THE THREATS CAME TO THE
ATTENTION OF THE REAGAN FAMILY APPARENTLY THROUGH THE CALIFORNIA
STATE POLICE.

[REDACTED] CRITICAL OF THE LACK

END PAGE ONE

ALL INFORMATION CONTAINED

HEREIN IS UNCLASSIFIED

DATE 5/6/94 BY SSA9803RDD/K

405,193

Ronald Reagan-3254

175-111-9

SEARCHED	INDEXED
SERIALIZED	FILED
SEP 9 1975	
FBI - SACRAMENTO	
Hathorn	
Robinson	
ARIPM	

PAGE TWO

SD 175-111

OF DISSEMINATION OF THE THREAT, FEELING THAT IF THE
DANGEROUS PROPENSITY OF [] HAD BEEN MADE KNOWN TO
APPROPRIATE FEDERAL LAW ENFORCEMENT AGENCIES, THE ATTEMPTED
ASSASSINATION OF PRESIDENT FORD MIGHT HAVE BEEN AVERTED.

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[] RECEIVED HIS INFORMATION IN THIS MATTER FROM A SOURCE WHOM
HE FEELS TO BE RELIABLE AND WHOSE IDENTITY

[] WILL NOT DIVULGE.

THE ABOVE IS BEING FURNISHED FOR INFORMATION AND ANY
POSSIBLE ACTION DEEMED APPROPRIATE BY SACRAMENTO.

END

FOR ANY QUESTIONS/CORRECTIONS CONTACT SAN DIEGO DIVISION

ACK FOR TWO TELS

SJP FBI SC CLR

Ronald Reagan-3255

(Mount Clipping in Space Below)

ALL INFORMATION CONTAINED

HEREIN IS UNCLASSIFIED

DATE 5/6/96 BY SSA9803RD/8
405,173**Reagan Recalls Threats**

Reagan, in an interview, at first said he could not recall being told of the threats at the time. Later, however, after discussing it with Mrs. Reagan, he said he recalled being informed.

The threats never were made public. They were viewed seriously by members of Reagan's staff, however, according to agents involved in the case.

One undercover agent said the plan was to kidnap Mrs. Reagan and their children and "torture and behead them one by one" until Manson was released from prison.

Dale Speck, director of the division of law enforcement under Younger, said the alleged Manson threat against Nixon and Reagan "is the attorney general's only recollection of threats involving the Manson Family."

Another Younger spokesman, however, said the state police, under Hickey, were primarily responsible for Reagan's security, and that Younger might not have been informed of other threats involving the Manson Family.

Message From Prison

One of the threats involved an alleged message from Manson, then in prison, to Lynette (Squeaky) Fromme, according to an undercover agent. Miss Fromme, a Family member, was indicted in Sacramento yesterday for pointing a pistol at President Ford last Friday.

Hickey said the alleged Manson Family threats came at a time when Mrs. Reagan already had been threatened with "maiming and killing" and that she already was receiving "full-time, around-the-clock protection."

Hickey emphasized, however, that he personally did not have information that Charles Manson ordered his followers to kidnap or harass the Reagans.

"Police intelligence determined that this was the understanding that the Family had as to what their role was, (and) it was our interpretation that this was the way it could happen, because of the utterances of the Family, as reported by informants who could say what the Family was talking about."

Ronald Reagan-3256

BY MANSON**Reagan Tells Of Threats To Family**

By JACK WEBB

Gov. Reagan and his family were under heavy guard his last year in office because of threats by the Manson Family to kidnap Mrs. Reagan and her children, Reagan said yesterday.

At the same time, a spokesman for Atty. Gen. Evelle Younger said that four years ago Manson made a threat to send "five people to assassinate President Nixon and Reagan."

A series of threats against his family were attributed to the Manson Family between the fall of 1973 and the time Reagan left office in January, 1975, Gov. Reagan said.

Edward V. Hickey, executive director of the California State Police under Reagan, said he became aware of reports about alleged Manson Family threats against the Reagans in the fall of 1973 and that it was his understanding that the reports came from "informants who could say what the Manson Family was talking about." Hickey said the FBI and other agencies were aware of the alleged threats.

(Indicate page, name of newspaper, city and state.)

Date: 9/11/75
Edition: SAN DIEGO UNION
Author: JACK WEBB
Editor:
Title: REAGAN TELLS OF THREATS TO FAMILY
Character:
or
Classification: 175
Submitting Office: SAN DIEGO
☐ Being Investigated

SEARCHED	INDEXED
SERIALIZED	FILED
SEP 13 1975	
FBI - SACRAMENTO	

175-73 E-64

9/11/75

AIRTEL

TO: DIRECTOR, FBI
FROM: SAC, SAN DIEGO (175-111) (P)
SUBJECT: FROMFORD

Re SC teletype to the Bureau 9/10/75; SD facsimile
to SC 9/11/75.

Re: Article By Newspaper Columnist Jack Webb
San Diego Union, 9/11/75

Enclosed for the Bureau are two copies of an
article by newspaper columnist Jack Webb appearing on the
front page of the San Diego Union, morning edition, 9/11/75,
entitled, "By Manson Reagan Tells of Threats To Family".
Two copies of this clipping are also furnished to Sacramento
and one copy of this clipping is being furnished to San Francisco
and Los Angeles in view of their interest in this matter.

ALL INFORMATION CONTAINED

HEREIN IS UNCLASSIFIED

DATE 5/6/96 BY SSA9803 RDD/

405,193

2-Bureau (Encls. 2)
1-Los Angeles (Encl. 1) (INFO) *OK*
2-Sacramento (Encls. 2)
1-San Francisco (Encl. 1) (INFO)
2-San Diego

JAB/asc
(8)

175-725-65

SEARCHED	INDEXED <i>llh</i>
SERIALIZED <i>llh</i>	FILED <i>llh</i>
SEP 13 1975	
FBI - SACRAMENTO	

Latham

Ronald Reagan-3257

Statement issued by Governor Reagan on the signing
of AB 1304 on March 23, 1974

"I realize this is an extremely controversial bill and that both sides have put forth convincing arguments for their points of view. However, I feel that by signing the bill into law, California will maintain its position of leadership in formulating interstate taxation policy and will continue to have the opportunity to protect its interests. In addition, this action will forestall preemption of this vital policy-making area by the federal government. I believe the states, who have a better understanding of their particular problems involving taxation, are in a better position to determine policy in taxing multi-state taxpayers."

ALL INFORMATION CONTAINED

HEREIN IS UNCLASSIFIED

DATE 5/6/96

BY SSA 9803 RDD/ER

405,193

*2001 added for
SC 194-9 RPC
10/11/78*

Ronald Reagan-3115

SEARCHED	INDEXED
SERIALIZED	FILED
AUG 3 1978	
FBI - SACRAMENTO	

[Signature]

memorandum

DATE: 8/7/78

REPLY TO
ATTN OF:

SAC, LOS ANGELES (183-250)(22)(P)

SUBJECT:

UNSUBS;
POLITICAL CORRUPTION
CALIFORNIA STATE LEGISLATURE

TO:

RICO
OO: Sacramento

TO: SAC, SACRAMENTO (183-79)

Re Los Angeles letter to Sacramento dated 7/10/78.

Enclosed herewith is a copy of a verbatim statement by former California Governor RONALD REAGAN on signing AB 1304 into law on March 23, 1974.

For investigative purposes, the significant period of time in this legislation's history runs from date of authorship by Senator NEWTON RUSSELL which is 2/28/74, through 3/23/74, when REAGAN signed the bill into law. It is significant to note that REAGAN's statement which is enclosed makes reference to "an extremely controversial bill."

In the interim period between 2/28/74, and 3/23/74, the legislation was vigorously opposed by major corporations headquartered in states other than California, who were doing business in California. Conversely it developed that many California headquartered corporations, particularly Standard Oil of California, favored the bill as it would have brought a more equitable corporate tax rate to California headquartered corporations. It is explained that corporations doing business in California but headquartered in other states were to that point in time taxed only in their home states.

Two of the many out-of-state corporations opposing this legislation were the [redacted] headquartered in [redacted] and the [redacted] of [redacted]

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In the case of [redacted]

- ② - Sacramento (Encl. 1)
2 - Los Angeles

NRL/sk
(4)

183-77-2-1

SEARCHED	INDEXED
SERIALIZED	FILED
AUG 3 1978	
FBI - SACRAMENTO	

Identify sources of information & classify allegations before investigation

Mulligan



Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan
Ronald Reagan-3116

[redacted] is understood to have flown to Sacramento and discussed AB 1304 with [redacted] and then [redacted]. During these meetings, it is further understood that [redacted] expressed strong opposition to the bill on behalf of his corporation. It has further been reported that during [redacted] discussions with [redacted] and possibly [redacted] he came to learn that one or both of the aforementioned men were prepared to kill the bill for \$50,000 and further that the money was to be transmitted initially to [redacted]. As previously set forth in referenced letter [redacted] at [redacted] one [redacted] is also understood to have been apprised of the fact that the legislation could have been killed for \$50,000 by [redacted]. In the case of the [redacted] [redacted] Sacramento. telephone [redacted] was personally told by [redacted] that the bill could be killed for \$50,000.

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It is further understood that at that point in time [redacted] and [redacted] very likely attempted to capitalize on their respective positions in the Assembly and may have offered [redacted] guarantees that they could influence the passage of this legislation, presumably for a large sum of money.

It is further understood that the [redacted] [redacted] had [redacted] to push the passage of AB 1304 through the Legislature. It is reported that [redacted] had conversations with [redacted] and [redacted] during which time they may have offered their support for the bill for an unknown sum of money and that the possibility may exist that [redacted] and others seeking the legislation, paid money inasmuch as AB 1304 was ultimately passed into law.

It is further understood that a [redacted] [redacted] would have known whether [redacted] and/or [redacted] offered their support of AB 1304 for money and were paid off once the bill was passed.

LA 183-250

It is further reported that Assemblyman RUSSELL introduced what is referred to as a "clean up bill", AB 4093, which was passed on 4/25/74, and which essentially minimized the effects of the important sections of AB 1304.

The following are additional segments of information which may be useful to Sacramento as this information is pursued:

[REDACTED]

It is further reported that at approximately the point in time when AB 1304 was being heard by the State Assembly [REDACTED] accumulated a restaurant and bar bill of approximately \$500 at [REDACTED] which is a [REDACTED] in Sacramento. It is further reported that on the instructions of [REDACTED] the bill was submitted to the [REDACTED] for payment. It is understood that [REDACTED] took the matter to the [REDACTED] superior from whom he receives instructions and was told that the [REDACTED] would not permit him to pay the bill through [REDACTED] monies. It is further reported that [REDACTED] rather than antagonize or provoke [REDACTED] paid the \$500 restaurant and bar bill accrued by [REDACTED] through his own resources.

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In view of the above, it is recommended that [REDACTED] be interviewed at his Sacramento offices with the approach being that he

LA 183-250

was being contacted to secure his views on why AB 1304 was passed. Sacramento should be aware that [redacted] initial reaction should be defensive since it is understood that he was approached to pay [redacted] \$50,000 to kill that legislation.

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It is further suggested that initially the interviewing Special Agents should refrain from discussing knowledge of his direct offer from [redacted] and rather approach him by soliciting his cooperation and views on why the bill was passed. In this regard, the initial questions suggested should pertain to the bill itself, the identities of the corporations that would have benefited from the passage of the bill, particularly the corporations that were actively supporting it, including [redacted]. If it develops that [redacted] is receptive to that line of questioning, then mention of [redacted] and [redacted] posture should be directed to him. It is further suggested that [redacted] degree of knowledge relative to [redacted] role in the passage of this legislation should be elicited. Assuming that [redacted] extends his cooperation to that point, he should be specifically questioned as to whether [redacted] ever directly approached him for \$50,000 to kill the legislation.

FEDERAL BUREAU OF INVESTIGATION

REPORTING OFFICE SACRAMENTO	OFFICE OF ORIGIN SACRAMENTO	DATE 10/7/77	INVESTIGATIVE PERIOD 1/24 - 9/23/77
TITLE OF CASE DONALD KENT BROWN		REPORT MADE BY SA JOHN F. MULLIGAN	TYPED BY SMD
		CHARACTER OF CASE RICO	

REFERENCES: Latel to Bureau 4/20/77, entitled UNSUBS, Corruption, California State Legislature, RICO, OO: LA;
 LAairtel to SC, 4/28/77;
 LAairtel to HO, 6/22/77;
 LVlet to LA, 7/20/77;
 WFOairtel to SC, 7/25/77.

- P -

ALL INFORMATION CONTAINED
 HEREIN IS UNCLASSIFIED

DATE 5/6/96 BY SSA9803RDP/
 405,193

ENCLOSURES

TO THE BUREAU AND RECEIVING OFFICES EXCEPT LAS VEGAS:
 One copy each of three newspaper articles dated 3/2/74, 4/3/74,
 and 5/19/75.

ACCOMPLISHMENTS CLAIMED						<input checked="" type="checkbox"/> NONE	ACQUIT- TALS	CASE HAS BEEN:
CON VIC.	PRETRIAL DIVERSION	FUG.	FINES	SAVINGS	RECOVERIES			
							PENDING OVER ONE YEAR <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
							PENDING PROSECUTION OVER SIX MONTHS <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

APPROVED <i>[Signature]</i>	SPECIAL AGENT IN CHARGE	DO NOT WRITE IN SPACES BELOW	
COPIES MADE: 3-Bureau (Enc. 3) 1-USA, Sacramento (Enc. 3) 2-Las Vegas (183-157) 2-Los Angeles (183-250) (Enc. 3) 2-San Diego (Enc. 3) 2-San Francisco (Enc. 3) 2-WFO (183-153) (Enc. 3) ②-Sacramento (183-94) <i>Smd</i>		183-94-41	
		h2 5	
		<i>Mulligan</i>	
		Notations	
		1 cc destroyed 4/18/80 smt 2 cc to state Fair Political Practices Comm. 5/2/80	
Dissemination Record of Attached Report			
Agency			
Request Recd.			
Date Fwd.			
How Fwd.			
By <i>[Signature]</i>	Ronald Reagan-4366		

SC 183-94

ADMINISTRATIVE

The investigative period is eight months due to the fact that investigation was conducted by the Los Angeles office regarding related matters, and portions of that investigation have been included in this report for clarity.

For information of the Bureau, Sacramento is maintaining a control file entitled UNSUBS; Corruption, California State Legislature, RICO, OO: SC, SC 183-79. This file is being used for dissemination of information regarding illegal activity centered around the California State Legislature. After sufficient information is developed and manpower available, new cases will be opened regarding specific individuals who are named in the control file.

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The Las Vegas office by letter dated 7/20/77, provided the following background information regarding NADINE HENLEY [redacted] and ROBERT F. BENNETT as obtained from Las Vegas indices check and contact with established and reliable sources:

NADINE MARGARET HENLEY is described as follows:

Race	Caucasian
Sex	Female
DPOB	11/8/06, Bloomington, Indiana
Height	5'2"
Weight	175
Hair and eyes	Gray
SSAN	469-01-0103
Spouse	HUDSON SNOWDEN MARSHALL
Residence	4072 Township Avenue Simi Valley, California

On 7/15/77, [redacted]
[redacted], anonymity requested, furnished the following information:

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LV 183-157

She was born at Bloomington, Indiana, on 11/8/06; and is married to HUDSON SNOWDEN MARHSALL, a self-employed consultant in systems analysis. She does not have any children.

She attended the Mac Phail School of Music and Drama, Minneapolis, from 1928 to 1930, taking a teacher's course in drama. She also has taken college extension courses in investments, accounting, management development, etc.

She has resided in the greater Los Angeles area since 1957.

She has the following work record:

1928 - 1929	W. B. Foshay Company, Minneapolis - traveling secretary
1930 - 1933	BancNorthwest Company, Minneapolis - secretary to president
1935	Anglo-California Bank, Chicago - general office
1935 - 1936	Lehman Brothers, Chicago - asst. office manager
1936 - 1937	Piper, Jaffray & Hopwood, Minneapolis - stock trading
1938 - 1940	Searl-Merrick Company, Los Angeles - technical writer
1940 - date	Summa Corporation (Hughes Tool Co.) Los Angeles - Exec. engineering secretary to Sr. Vice President - Director

She was arrested for driving under the influence in 1950, by the Los Angeles Police Department; disposition, fine.

She never has been named in any lawsuit.

LV 183-157

She has the following divorces:

<u>Date</u>	<u>Place</u>	<u>Spouse</u>
1927	Los Angeles	Ivan Franke
1937	Los Angeles	Ronald Chambers (deceased)
1951	Los Angeles	Alfred E. Buss
1963	Los Angeles	Erling Andreas Daniels

Her true maiden name is MARGARET MAE HENLEY. However, in 1943, she changed her name to NADINE MARGARET HENLEY, and since has used the name NADINE HENLEY, for business purposes.

Further information obtained from Las Vegas indices regarding NADINE HENLEY reflect HENLEY was, for 20 years or more, the private and personal secretary to HOWARD HUGHES. HENLEY presently holds the position in the Summa Corporation as Senior Vice President and Director.

NADINE HENLEY has constantly been in the news concerning suits against HOWARD HUGHES regarding Hughes Air West, ROBERT MAHEU and the HUGHES will. An article appearing in the Las Vegas "Sun", a daily newspaper, on 3/2/74, entitled "Hughes Gave Orders To Own All Nevada Law Makers; Galane," described HENLEY as "HUGHES' long time personal secretary, who was the eyes and ears of HOWARD HUGHES."

[redacted] is described as follows:

Race	Caucasian
Sex	Male
DOB	[redacted]
POB	Los Angeles, California
Height	6'
Weight	180 pounds
Hair	Brown
Eyes	Hazel
SSAN	[redacted]
Spouse	[redacted]

Service Record	U. S. Army 1943 - 1946
Army Service No.	[redacted]

LV 183-157

Residence

[REDACTED]
Encino, California

Business Address

[REDACTED]
Las Vegas, Nevada 89156

b6
b7C

b6
b7C
b7D

On 7/15/77, [REDACTED] anonymity requested,
furnished the following information regarding [REDACTED]

[REDACTED] was born on [REDACTED] at Los Angeles,
California. He graduated from [REDACTED]
[REDACTED] attended the [REDACTED]
[REDACTED] during [REDACTED] and [REDACTED]
[REDACTED] from [REDACTED] graduating with
a BBA Degree. He served in the U. S. Army from 1943 to
3/5/46.

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He married the former [REDACTED]
Oklahoma, at Los Angeles, in 1945. They have a son, age
28 and another son and daughter, age 27. [REDACTED] and his
wife live at [REDACTED] Encino, California, where
they have resided for 12 years.

He indicates he has never been a party to any
lawsuit and that he has never been arrested.

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[REDACTED]

Applicant sets forth his record of employment as
follows:

<u>Employer</u>	<u>Position</u>	<u>Dates</u>
[REDACTED] [REDACTED] Los Angeles, CA	[REDACTED]	1946-1949
[REDACTED] Gardena, CA	[REDACTED]	1948-1949

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<u>Employer</u>	<u>Position</u>	<u>Dates</u>
[REDACTED] Los Angeles, CA	[REDACTED]	1949-1950
[REDACTED] Van Nuys, CA	[REDACTED]	1951-1966
[REDACTED] Los Angeles, CA	[REDACTED]	1967-1973
Summa Corporation Las Vegas, Nevada	[REDACTED]	5/73-Present

[REDACTED] position and duties are outlined as follows:

Position:
Division:
Group:

[REDACTED]

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Job Summary:

[REDACTED]

Further details of his work performed is contained in Board files.

Las Vegas indices regarding ROBERT F. BENNETT as to background information were negative. A check of Shared Computerized Operations for Protection and Enforcement (SCOPE) was also negative regarding BENNETT. Contact with [REDACTED] was also negative regarding ROBERT F. BENNETT.

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On 7/13/77, [redacted] advised ROBERT F. BENNETT is presently employed by Summa Corporation as the Public Relations Officer for this corporation and supposedly is based at Las Vegas, Nevada. Source was also asked at this time if he knew any information regarding Summa Corporation, its subsidiary companies or HOWARD HUGHES to be involved in a "laundering" procedure to conceal political contributions throughout the United States and source stated he had no knowledge nor had he heard of this.

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Las Vegas indices do reflect that one ROBERT F. BENNETT was highlighted in an article appearing in the Las Vegas "Sun" dated 4/3/74. This article identifies ROBERT BENNETT as being the son of Senator WALLACE BENNETT of Utah and alludes to the fact that BENNETT had left the Department of Transportation in Washington, D. C., to take over the Mullen Public Relations Firm in Washington, D. C. The article states BENNETT was a trusted and good friend of the Nixon Administration and that one of BENNETT's new clients was HOWARD HUGHES.

Las Vegas file review failed to reflect any information which would indicate Summa, Inc., its subsidiary companies or HOWARD HUGHES was involved in a "laundering" procedure to conceal political contributions throughout the United States, however, an article dated 3/2/74, appearing in the Las Vegas "Sun" entitled "Hughes Gave Orders To Own All Nevada Law Makers; Galane," alludes to the fact HUGHES contributed lavishly to campaigns of Nevada politicians for the sole purpose of owning every state senator, assemblyman, every judge and every commissioner. The article further states HUGHES brought in people from the nationally known accounting firm of Haskin and Sells to set up a money control system that would provide a record of who drew money and who authorized it. The article continues on by saying HUGHES contributed \$50,000 in cash for the 1968 presidential campaign of former Democratic Vice President HUBERT HUMPHREY; \$25,000 to the estate of the late Democratic Senator ROBERT KENNEDY and \$100,000 to the campaign of RICHARD NIXON. This donation of \$100,000 to RICHARD NIXON was handled through NIXON's close friend, CHARLES BEEB REBOZO, and received much notoriety during the Watergate investigation.

WFO 183-153

WHB:dam

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On July 19, 1977, a review of Washington Field Office references on the Robert R. Mullen Company revealed no information showing this business being involved in any type of political payoffs or bribes or any other illegal activities.

For information most of the Washington Field references on the Robert R. Mullen Company were noted in case entitled "JAMES WALTER MC CORD, JR., aka ET AL; Burglary, Democratic National Committee Headquarters, Washington, D.C., June 17, 1972, IOC; OO:WFO," case file 139-166.

A review of WFO case file reference 139-166 serial 1037 reflected a nitel from the Boston Division to the Activity Director. This nitel stated a [redacted] Rhode Island, [redacted]

[redacted] in 1960, and former associate of [redacted] of Robert R. Mullen and Company, Washington, D.C., advised he was approached by one [redacted] on July 28, 1971, for derogatory information of KENNEDY Family and their associates. [redacted] gave [redacted] a telephone number [redacted] to contact him and [redacted] also contacted through [redacted].

[redacted] advised [redacted] on July 19, 1972, that [redacted] is an alias used by [redacted] another member of the firm, [redacted] No additional references were made to [redacted] in WFO files.

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WMP:smd

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ADMINISTRATIVE

On 8/1/77, [] was contacted by SA WADE M. PLUCKER and advised source had observed an article in the "Sacramento Bee" pertaining to DONALD KENT BROWN and indicated the article had caused somewhat of a furor around the Capitol. Source indicated BROWN allegedly was aware of the article approximately a week before it was published and did not appear to be too distressed by its publication. Source indicated BROWN allegedly made a statement that it was good for business.

In addition, source advised source had determined that approximately two years ago, [] (FNU) [] who at that time was the [] [] had been involved with BROWN in some sort of activity regarding legislation which pertained to the activities of the Transportation Department. Source indicated allegedly BROWN had approached [] in an attempt to obtain his cooperation in advocating a bill, and [] had indicated he would do so. However, in return, [] requested that BROWN and his legislative lobbyist business utilize the services of the [] Source could not determine whether or not BROWN had actually utilized [] but felt this could be determined through investigation.

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For the information of Las Vegas and WFO, it is anticipated that leads will be set out to simultaneously interview NADINE HENLEY [redacted] and ROBERT F. BENNETT, who are all associated with Summa Corporation and possibly [redacted]

LEADS

All offices conducting investigation in this matter are requested to submit results of investigation in report form with one copy designated to USA, Sacramento, ATTN: AUSA THOMAS T. COURIS.

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LOS ANGELES, SAN DIEGO, AND SAN FRANCISCO

California offices should be aware of this investigation in view of the fact state officials are involved, and any future criminal allegations involving former or present members of the California State Legislature and California State officials in Sacramento should be referred to the Sacramento office. Additional leads will be set out in the near future.

LAS VEGAS

AT LAS VEGAS, NEVADA: Identify [redacted] to determine his location for future interview. According to FD-302 of DONALD KENT BROWN [redacted] is [redacted] for Summa Corporation in Las Vegas.

2) Determine through pretext call or other means if ROBERT F. BENNETT is employed by Summa Corporation and ascertain specific location.

WFO

AT WASHINGTON, D.C.: Attempt to locate ROBERT F. BENNETT as mentioned in WFOairtel to SC, 7/25/77. BENNETT is also referred to in enclosed newspaper articles. Determine if BENNETT is still associated with ROBERT R. MULLEN's Public Relations firm, Washington D.C.

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SC 183-94.

2) Determine if BRUCE J. BRENNAN continues to act as general counsel for Pharmaceutical Manufacturers Association (PMA), 1155 15th Street NW, Washington, D.C. 20005, telephone 202-296-2440. Also conduct indices check on BRENNAN and PMA.

SACRAMENTO

AT SACRAMENTO, CALIFORNIA: This matter is being designated as a target case of the Sacramento office. It is anticipated that after ROBERT MORETTI appears before the FGJ on 9/28/77, several areas of investigation will be developed and pursued.

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UNITED STATES DEPARTMENT OF JUSTICE
FEDERAL BUREAU OF INVESTIGATION

Copy to: 1 - USA, Sacramento (Enc. 3)
ATTN: AUSA THOMAS T. COURIS

Report of: SA JOHN F. MULLIGAN
Date: 10/7/77

Office: SACRAMENTO

Field Office File #: 183-94

Bureau File #:

Title: DONALD KENT BROWN

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED

DATE 5/6/94 BY SSA 9803 RDA/E
405,193

Character: RACKETEER INFLUENCE AND CORRUPT ORGANIZATIONS

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Synopsis: On 4/13/77, ROBERT MORETTI, former Speaker of California State Assembly, advised that in 1966, [redacted] (last name unknown), who was representing Tenneco, Inc., offered him (MORETTI) and JESSE MARVIN UNRUH, then Speaker of the California State Assembly, \$175,000 each over the next 20 years if UNRUH would intervene with President LYNDON B. JOHNSON on behalf of Tenneco, Inc. In 1970, [redacted] offered MORETTI \$250,000 cash for his support of a State Assembly bill involving farm labor. In 1972, lobbyist JEFFERSON PEYSER offered MORETTI \$100,000 cash for MORETTI's support of a bill regarding mortgage brokers. In 1973, lobbyist DONALD KENT BROWN offered MORETTI \$100,000 cash for support of a bill also involving mortgage brokers. MORETTI advised he accepted none of these bribes. He also advised State Senator DILLS and former State Senator RANDOLPH COLLIER are not considered by him to be honest, responsible, and ethical men. MORETTI reinterviewed on 6/15/77, at which time he recalled that [redacted] California, had in 1973 solicited \$1,000 from him (MORETTI) for [redacted] favorable vote on a bill involving public employees, which would be voted on in committee. During this interview, MORETTI stated in his judgment, the worst offenders among California State legislators are State Senator RALPH C. DILLS of Gardena, California, ALFRED H. SONG of Monterey Park, California; and former Senator RANDOLPH COLLIER of Yreka, California, whom he feels have accepted monetary bribes in the past. DONALD KENT BROWN and JEFFERSON PEYSER interviewed and denied making any bribe offers. [redacted] advised BROWN continues to conduct illegal activities and stated she

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feels BROWN is a dishonest man. JESSE UNRUH, Treasurer, State of California, denied knowledge of bribe offers related by MORETTI. On 8/9/77, [redacted] advised State Senators SONG and DILLS have reputations for acting unscrupulously. [redacted] Sacramento, advised DONALD KENT BROWN was known to distribute large sums of moneys in the form of political contributions to legislators prior to the passage of the California Political Reform Act of 1974. He suspects BROWN continued to direct or disseminate moneys in the same manner although it is prohibited by the Political Reform Act of 1974. AUSA, Los Angeles, advised bribe offers involving lobbyists representing interest of mortgage brokers constituted violation of RICO statute; however, venue would be in Sacramento. AUSA, Sacramento, advised bribe offers and acceptance of bribes constituted felony violations under California Penal Code Sections 85 and 86 and would apply to RICO statute.

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ENCLOSURE

TO USA, SACRAMENTO: One copy each of three newspaper articles dated 3/2/74, 4/3/74, and 5/19/75.

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DETAILS

PREDICATION

This case is predicated on information received from ROBERT MORETTI, former Speaker of the California State Assembly.

INTERVIEWS OF ROBERT MORETTI

FEDERAL BUREAU OF INVESTIGATION

1

Date of transcription 4/15/77

ROBERT MORETTI, Commissioner, California Energy Resources Conservation and Development Commission, was interviewed at his offices, 1111 Howe Avenue, Sacramento, California, telephone number 322-3690. Mr. MORETTI, former Speaker of the California State Assembly, was advised that the Federal Bureau of Investigation (FBI) was in receipt of information which indicated that on or about 1974 he was the recipient of campaign contribution funds from Long Beach, California, business interests, specifically, the Long Beach "Independent Press Telegram" and the architectural firm of Killingsworth and Brady. Mr. MORETTI was advised that the monies were alleged to have been directed to his 1974 Democratic Gubernatorial

[redacted] from [redacted]
[redacted]

Mr. MORETTI was further informed that it was alleged that he received the campaign monies after his intervention in behalf of Long Beach, specifically

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[redacted]
[redacted] in influencing or instructing [redacted]
[redacted] to withdraw his bill [redacted]
[redacted]
[redacted]

Mr. MORETTI was advised that his alleged role of having ordered or influencing [redacted] to withdraw his bill and, thereafter receiving campaign funds from those he assisted, could possibly be construed as a bribe. It was further explained to Mr. MORETTI that based on the above allegation he was then to be afforded his rights as set forth on FBI form entitled "Interrogation; Advice of Rights" before the interview could continue. Mr. MORETTI thereafter read the aforementioned advice of rights form, acknowledged he understood its contents, and thereafter affixed his signature to the document.

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Interviewed on 4/13/77 at Sacramento, California File # Los Angeles 183-169
by SA JOHN F. MULLIGAN and SA NORBERT R. LINKER/NRL/lkp 5 Date dictated 4/15/77
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Mr. MORETTI stated that he is acquainted with [redacted] and [redacted]

[redacted] respectively. He advised that, to the best of his recollection, he has met [redacted] on two or three occasions, both having occurred in the Los Angeles or Long Beach area. He stated that, as he recalls, the first meeting occurred at a point in time subsequent to Long Beach's acquisition of the Queen Mary; the second occasion having occurred in connection with a meeting or panel which pertained to then Governor REGAN's introduction of the controversial bill known as Proposition One.

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Mr. MORETTI was informed that the information in possession of the FBI indicates that he had occasion to meet with [redacted] and [redacted] on or about 1974, at which time [redacted] requested that he suggest or order [redacted] to cease his efforts to [redacted]

[redacted] It was further pointed out to Mr. MORETTI that the incident to which he was then being referred resulted in MORETTI ordering [redacted] into his office from his Assembly chair and that he then requested or ordered [redacted] to rescind his bill regarding [redacted]. Mr. MORETTI was further advised that, according to the allegation [redacted] heeded MORETTI's request and at a point shortly thereafter monies from [redacted] and [redacted] were forwarded to [redacted] at Sacramento, California, who deposited the money into his own personal accounts and, thereafter, withdrew personal checks to his (MORETTI's) 1974 Gubernatorial campaign committee. Mr. MORETTI advised that he does not have any recollection of a meeting with [redacted] and [redacted] in his offices

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which adjoined the State Assembly. He stated further that he could not recall having a meeting with [REDACTED]

[REDACTED] over [REDACTED] proposed or authored bill to [REDACTED] at this time.

Mr. MORETTI advised that the possibility does exist, however, that a meeting with [REDACTED] did occur and that the matter of [REDACTED] was the subject of the discussion. He advised that he wanted to make his position clear in that, if a meeting did occur, which he can not recall, it was not the result of having been offered monies or political support by [REDACTED] [REDACTED] for his intervention in the aforementioned dispute with [REDACTED]

Mr. MORETTI then advised that if there was documentation on hand which indicated that his campaign committee of 1974 received campaign contributions from [REDACTED] that that was not to be considered unusual. Mr. MORETTI advised that Proposition Nine became effective in 1974 and put severe prohibitions upon registered lobbyists. Included among those prohibitions was the fact that they were no longer permitted to distribute campaign contributions on behalf of their retained clients. He advised that essentially Proposition Nine minimized the lobbyists' influence among politicians at Sacramento in that the clients were now required to disseminate their contributions directly.

Mr. MORETTI stated that he is very concerned over the FBI's inquiry relative to his role in having allegedly received a bribe. He explained that he is presently awaiting a presidential appointment involving international responsibilities and wants to satisfy the Agents' inquiry in order to remove any possibility of tainting his reputation.

Mr. MORETTI stated that he considers the California Legislature as a whole to be extremely

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honest, responsible, and ethical. He advised that in the case of any large legislative body there are exceptions, many of whom are known to the FBI, including the DILLS' (presumably referring to RALPH C. DILLS, California State Senator), the COLLIERS' (presumably referring to JOHN L. E. COLLIER, State Assemblyman).

Mr. MORETTI stated that if the FBI was seeking to identify those who were receptive to bribery, he suggested that they conduct an investigation to determine who entered the State Assembly or Senate with modest wealth but who have attained extreme wealth during their tenures of office.

Mr. MORETTI stated that he has always been extremely circumspect in choosing his friends and associates in political life for fear that their misdeeds might reflect upon him. He pointed out further that he has aspired to be the President of the United States in that he enjoys politics, feels his services can be extremely useful to his country, but is also cognizant of his Italian heritage and the inherent suspicions that the electorate would have about an Italian. MORETTI offered that his father was an immigrant from Italy and raised his family to appreciate the benefits that America offers. Mr. MORETTI then explained that by comparison, the United States, although not perfect, enjoys a unique integrity among politicians. He cited the fact that in European countries bribery and corruption are prevalent whereas in the United States a minimal number of politicians are involved in that type of activity.

Mr. MORETTI was then asked whether he had ever been offered bribes while a member of the California State Assembly.

Mr. MORETTI responded in the affirmative, but then wanted clarification by the interviewing Agents as to whether admission of offers of bribes consisted of a violation of law.

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Mr. MORETTI was informed that the FBI was most anxious to resolve allegations of corruption and, further, was seeking his cooperation in identifying those politicians whom he personally knew to have been offered bribes and thereafter accepted them.

Mr. MORETTI explained that a lobbyist operating prior to the passage of Proposition Nine in 1974 had certain flexibilities which he does not have at this time. He stated that a lobbyist acting in behalf of a client would extend a bribe offer in a one-on-one situation involving himself and the politician to whom he was offering the monies. He advised that these actions are always one-on-one in order to avoid witnesses who at a later point in time could testify against either the lobbyist or the receptive politician.

Mr. MORETTI then referred the Agents back to his previous question as to whether admissions of having been offered bribes was in effect implicating himself in a criminal violation.

Mr. MORETTI was informed that any admissions of bribery by him or anyone else as an elected official would be referred to the United States Attorney's (USA) Office and, if necessary, the Department of Justice for a prosecutive opinion. He was further informed that the interviewing Agents were merely the investigative arm of the Department of Justice and that the facts gathered were referred to the Department for prosecutive opinions.

Mr. MORETTI was further advised that any admissions that he had thus far made or would make regarding bribe offers would be resolved at the Department of Justice, but that it was hoped that he would fully extend his cooperation regarding this matter. He was advised that the Agents were aware of his leadership role in the California State Assembly

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for upwards of five years and that the powers of that office, if corrupted, would do irreparable harm to the State of California. Mr. MORETTI agreed that as Speaker of the Assembly he could use his influences to push through legislation benefiting a corporation or individual or, conversely, influence the members of sub-committees, authors of bills to cease their efforts towards passage of legislation.

Mr. MORETTI stated that he wanted to make it clear that he was offered two bribes while a member of the State Assembly, the first which occurred 11 years ago and, in his judgment, was beyond the Statute of Limitations. He further pointed out that in the case of the second offer of bribes which occurred while he was Speaker of the Assembly in 1971 and amounted to \$250,000 cash.

He advised that in both instances he immediately refused the offers.

Mr. MORETTI advised that in the case of the bribe offer extended him 11 years ago while a relatively new State Assemblyman, it involved his receiving \$175,000, tax free, for a 15 year period to exert his influence on behalf of a major corporation in the United States.

At that point in the interview Mr. MORETTI's secretary informed him that his commission meeting had then commenced and his presence was required in order to complete a quorum.

The Agents advised Mr. MORETTI that they were prepared to return after his commission meeting had been concluded later that day. Mr. MORETTI apologized for the interruption and indicated that he was most anxious to resume the interview at 2:00pm that afternoon.

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At 2:00pm, the interview with Mr. MORETTI was resumed at his office.

Mr. MORETTI advised that in the intervening period between the morning session, he has reflected back on his admissions of having been offered two bribes and has raised certain questions within himself as to whether he is doing what he considers to be an ethical move. He further explained that his admissions of bribe offers will, in his judgment, ultimately result in severe damage to the lives, reputations, and families of those who have extended those offers of bribes and has reservations as to whether he is morally right in implicating them in this matter.

Mr. MORETTI was again informed that his own conscience will have to dictate whether he feels now or felt at the point in time that the bribors were then corrupting his own moral integrity. Mr. MORETTI stated that the offerings by the Agents were acceptable in his judgment and would proceed to discuss the bribe matters in as much detail as he can recall.

MORETTI stated that he wanted to correct an earlier statement that the bribe offer 11 years ago in the amount of \$175,000 was not for 15 years but rather for 20 years. Mr. MORETTI further offered that he wanted to correct his earlier statement that he had only been offered two bribes as he has now recalled four bribes.

Mr. MORETTI thereafter offered the following information concerning each of the aforementioned four bribe offers.

Bribe #1:

He stated that in 1970 a bill was passed through the State Assembly which appreciably benefited the farm workers in the State of California. Opposition

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to the passage of the bill came principally from various farm groups and associations in that the farmers income was appreciably affected by the aforementioned legislation.

He advised that in 1971 [redacted] [redacted] authored a bill which in essence counteracted some of the benefits received by the farm workers in the preceding year. He advised that [redacted] bill which was obviously instituted at the request of the farmers and the various associations was not well received in subcommittee hearings and prospects for its passage were minimal. He advised that one [redacted]

[redacted] contacted him in his assembly office at the State Capital Building on an unrecalled date in 1971 and informed him that he was prepared to offer him \$250,000 cash, tax free, for his support and influence in pushing the bill through the legislature. Mr. MORETTI advised that [redacted] explained that he felt that sufficient votes could be mustered in support of the bill and that he wanted MORETTI to merely let the bill "go through."

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MORETTI stated that he immediately rejected [redacted] offer of the \$250,000 and then quickly moved to have the bill killed. MORETTI stated that his influence was apparent as [redacted] then withdrew the bill from further committee hearings. Mr. MORETTI stated that as he recalls the exact verbage used by [redacted] in offering him the one-quarter million dollars tax free in cash was "let it go, I'll give you a quarter million cash."

MORETTI stated that he has never been a supporter of [redacted] [redacted] and has suspected him and

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his motives, particularly in view of [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]. He stated that in his opinion [REDACTED] was utilized to push the anti-farm workers legislation on behalf of [REDACTED]

[REDACTED] MORETTI stated that he can not prove that statement, but feels that [REDACTED] would not have injected himself into this matter unless agreements had been reached to whereby [REDACTED] was to accept a payoff for authoring and spear-heading the push for this legislation.

Bribe #2:

MORETTI advised that at an unrecalled point in time in 1971 or 1972, he was contacted in his State Assembly office by Sacramento lobbyist JEFF PEYSER who is the retained lobbyist for the California Independent Mortgage Brokers Association. Mr. MORETTI advised that the Independent Mortgage Brokers were seeking the passage of a bill authorizing an increase in their mortgage rates. MORETTI stated that Mr. JEFF PEYSER appeared at his office and on a one-on-one situation offered him \$100,000 cash for his support of the bill as Speaker of the State Assembly. Mr. MORETTI stated that he immediately rejected PEYSER's offer and thereafter contacted Assemblyman JACK R. FENTON of the Assembly Finance Committee and instructed FENTON to kill the mortgage brokers bill at that point in time, and FENTON complied.

Bribe #3:

Mr. MORETTI stated that at an unrecalled point in time in 1973, DONALD KENT BROWN, registered Lobbyist at Sacramento, who was then retained by the California Independent Mortgage Brokers Association, appeared at his State Assembly office and on a one-on-one situation offered MORETTI \$100,000 cash for his support and influence in moving for the passage

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of legislation that year which would have permitted the mortgage brokers higher interest rates.

MORETTI stated that he recalled this incident vividly in that DONALD K. BROWN went into a lengthy discourse explaining that his clients needed relief through higher interest rates and that if he (MORETTI) "moved the bill, they would take care of him to the tune of \$100,000."

MORETTI stated that he has had a genuine dislike for DONALD K. BROWN for an extended period of time and characterized him as "slimy." MORETTI stated that he was offended and angered at BROWN's offers of the \$100,000 and responded with a statement to BROWN to the effect, "Those mother fuckers can't pay me enough." MORETTI stated that it became apparent to him that BROWN realized his efforts and bribe offer were futile and left his office.

Bribe #4:

Mr. MORETTI stated that on or about 1966, while a relatively new Assemblyman for the 46th District of California, he became closely associated with then Assembly Speaker JESSE MARVIN UNRUH. MORETTI likened his relationship to UNRUH as his protege with an up and coming political future. He advised that it was well-known that he enjoyed a close association with UNRUH at that point in time.

With that as a form of background relative to UNRUH, he explained that at that point in time when [redacted] (last name unknown)(LNU), also known as [redacted]

[redacted] contacted him at his State Assembly office, again on a one-on-one situation. He advised that [redacted] (LNU) indicated that Tenneco was vying for Federal Government approval of a major undertaking which involved oil and/or oil pipeline installations amounting to millions of dollars in contracts. MORETTI stated

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that [] (LNU) explained that it became essential that Tenneco secure Federal Government approval of their proposals. MORETTI stated that as this conversation unfolded, [] (LNU) indicated that he, MORETTI, was known to enjoy a close and influential relationship with Assembly Speaker JESSE MARVIN UNRUH. He stated that [] indicated that MORETTI could persuade UNRUH to contact then President LYNDON B. JOHNSON and exert what influence he had upon the President to approve the plans and contracts of Tenneco relative to this new and extremely profitable oil and pipeline venture. MORETTI stated that [] (LNU) then proceeded to offer MORETTI and UNRUH \$175,000, tax free, for 20 years for their respective efforts on behalf of his client, Tenneco.

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MORETTI stated that being relatively new on the political scene and naive he did, in fact, contact UNRUH and explained that both he and UNRUH stood to receive the aforementioned \$175,000 each for the next 20 years should UNRUH be successful in persuading President JOHNSON, with whom he had access and influence, to approve the Tenneco position. MORETTI stated that UNRUH told him that JOHNSON would undoubtedly reject his efforts on behalf of Tenneco and refused to make the contact with the President. Mr. MORETTI stated that on receipt of UNRUH's refusal, he recontacted [] (LNU) and so informed him that UNRUH refused to intervene as he felt his efforts would be futile.

MORETTI was then asked whether he was in possession of any other offers of bribes made to him or other legislators with whom he is associated. He advised that the four offers of bribes cited were the only ones that he had personal knowledge of, but concluded that prior to the passage of Proposition Nine, lobbyists could, in fact, make overtures of this

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type to various influential politicians and presumes that in certain instances they were accepted whereas in his case he rejected them.

Mr. MORETTI advised that he has never made disclosures of bribe offers to anyone prior to this interview and added that his reason was that he had never been asked. Mr. MORETTI was then asked whether the meetings held with the aforementioned lobbyists who extended these offers of bribes on behalf of their clients was a matter of record on his calendars for the years in which they occurred. He stated that he has a vast number of documents at his home, including calendars, and would initiate a review of his documents to determine whether these calendars reflected appointment dates with those lobbyists. Mr. MORETTI then advised that should it develop that the FBI interview the corporate heads of the various companies and/or associations and their lobbyists who extended the bribes in their behalf and developed evidence or information to substantiate the bribe offers, he would then be willing to appear before a Federal Grand Jury to offer under oath the above information. He explained that in the absence of evidence to document his bribe offers, he is of the opinion that the Government could not prove that they occurred in that there were no witnesses to any of these meetings.

FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 6/24/77

Mr. ROBERT MORETTI, Commissioner, California Energy Resources Conservation and Development Commission, and former Speaker of the California State Assembly, was reinterviewed at the offices of his current employment. Mr. MORETTI was referred to his previous interview by the Federal Bureau of Investigation (FBI), at which time he offered information regarding bribes which he had received during his tenure in office as a State Assemblyman. Mr. MORETTI was further referred to his statement in his last interview wherein he advised that, to the best of his recollection, he was never requested by [redacted]

[redacted] to persuade [redacted]
[redacted], to cease his efforts in

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Mr. MORETTI's memory was further refreshed concerning his last interview with the Agents regarding his support, or lack thereof, from Long Beach interests in his various political campaigns as a State Assemblyman.

Mr. MORETTI was advised that as this investigation continues to progress certain information that has recently been developed tends to refute some aspects of his earlier interview and, for that reason, the Agents desired to again advise him of his rights. He was thereafter orally admonished of his rights and given Bureau form entitled "Interrogation; Advice of Rights," which he read; indicated he understood its contents, and thereafter signed.

Mr. MORETTI was then exhibited three checks drawn on the account of Los Alamitos Racetrack, Los Alamitos, California, and made payable to the "BOB MORETTI Campaign Committee" in March 1968, October 1968, and September 1970, in the amounts of \$5,000, \$2,500, and \$4,500, respectively. Mr. MORETTI advised that in 1968 he was appointed the Chairman of the Governmental Organization Committee of the State Assembly, which committee was responsible for overseeing and hearing legislation pertaining to racetrack matters in

sc 183-79-23

Interviewed on 6/15/77 at Sacramento, California File # Los Angeles 183-169

183-250-1

by SA JOHN F. MULLIGAN and
SA NORBERT R. LINKER/NRL/lkp

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Date dictated 6/21/77

Ronald Reagan-4393

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LA 183-250

the State of California. Mr. MORETTI stated that in 1968 he and his committee moved a considerable amount of legislation favorable to racetrack interests and, as a result, received many sizable unsolicited campaign contributions from racetrack interests throughout the State. MORETTI stated that the sum total of \$12,000 received during the years of 1968 through 1970 from Los Alamitos Racetrack was not, in his judgment, an exorbitant amount as other tracks, including Hollywood Park and Santa Anita, were as generous if not more so.

Mr. MORETTI stated that he could see no relationship between the contributions received from Los Alamitos Racetrack and any contacts which he may have had with [REDACTED] regarding Long Beach's difficulties with the State Lands Commission over the monies which that City was receiving from that commission for the renovation of the Queen Mary and other Long Beach projects.

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Mr. MORETTI was then referred to his previous interview wherein he advised that he could not personally recall having requested or ordered [REDACTED] to cease his efforts to rescind the Tideland Trust agreement with the City of Long Beach.

Mr. MORETTI was then exhibited two checks drawn on the account of the Los Alamitos Racetrack, dated July 27, 1978, in the amount of \$1,000, and October 7, 1968, in the amount of \$1,000, made payable to the [REDACTED]

[REDACTED] Mr. MORETTI was then referred to the endorsements on the reverse of those checks which revealed that [REDACTED] and/or one of his campaign staff had received the aforementioned checks and then endorsed them over to the BOB MORETTI Campaign Committee after which they were placed in deposit in his campaign committee accounts. Mr. MORETTI was further informed that it appeared unusual to the interviewing Agents that a politician in receipt of campaign contributions would endorse over checks made payable to him to another elected official for his own campaign.

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In response, Mr. MORETTI advised that frequently the leadership of the Republican or Democratic parties will solicit monies from fellow party politicians whose campaign races appear to be secure and their campaign coffers have what appears to be an excessive amount for their particular campaigns. MORETTI stated that the party leadership will then allocate those monies received from confident politicians who are running and place those monies into the campaigns where it is felt it can best be utilized in order to overcome a close race. MORETTI stated that in the case of the two checks endorsed over to him by [REDACTED] he can only assume that in that 1968 Assembly race he personally requested [REDACTED] to make available any excess campaign funds which he had for the Democratic party's use in close races. MORETTI stated that the checks received from [REDACTED] should not be construed as either a kickback or a patronage type payment to him or the Democratic party for any monies which [REDACTED] might have received from other sources. He advised that in his judgment it was a mere coincidence that the checks endorsed over by [REDACTED] to him were campaign contributions received by [REDACTED] from the Los Alamitos Racetrack.

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Mr. MORETTI was then referred to the portion of his previous interview wherein he admitted having been offered a total of four cash bribes from lobbyists during his tenure as a State Assemblyman in behalf of the lobbyists' clients. He was informed that the contents of that interview have been made available to the United States Attorneys in Los Angeles and Sacramento, California, and that his information constituted violations of Federal law under the jurisdiction of the FBI and that investigation regarding those disclosures was then underway. Mr. MORETTI was further informed that at an appropriate point in time it might become necessary for him to testify before a Federal Grand Jury regarding his information concerning the bribe offers and, thereafter, possibly his testimony would be needed as a Government witness.

Ronald Reagan-4395

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MORETTI advised that the information that he conveyed to the FBI during his last interview was correct and that if he were subpoenaed before any judicial body he would testify to the facts as previously furnished by him to the interviewing Agents.

MORETTI advised that in the intervening weeks since last interviewed, he recalled one other bribe incident which he wanted to relate to the Agents at this time. He stated that he had successfully moved a bill through the State Assembly in 1973 which essentially authorized collective bargaining for all State public employees. He stated that once the bill moved through the Assembly it was put into the State Senate Policy Committee which was the overseer of public employee matters. He stated that in the Senate subcommittee hearing the bill he determined that two of the five members were in favor of the legislation but that in order for it to go to Senate vote he needed one of the hold-out Senate subcommittee members in order to make it a three to five majority. MORETTI stated that at that point in time

[redacted] approached him and indicated that he would become his third favorable vote for \$1,000. MORETTI stated that he was stunned by this disclosure by [redacted] who further added "BOB, I've got to take a lot of heat but I'll vote your bill for \$1,000."

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MORETTI stated that he was stunned by the disclosure by [redacted] that he would take \$1,000 for the vote, and immediately suggested to [redacted] that he was not going to go along with his proposal and was prepared to let the bill die in subcommittee which, in fact, did occur.

MORETTI stated that, to the best of his recollection, [redacted] approached him on the willingness to accept \$1,000 for his vote in a private conversation and, for that reason, could not refer the Agents to anyone who was privy to his offer other than [redacted] himself.

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MORETTI advised that [redacted]
[redacted] is one of [redacted] whom
he knows or suspects of having accepted monies for
favors during his tenure in public office. MORETTI
advised that, in his judgment, the three worst offenders
among California Legislators who he feels have accepted
numerous monetary bribes are State Senator RALPH DILLS,
of Gardena, California; Senator ALFRED H. SONG, of
Monterey Park, California; and retired Senator RANDOLPH
COLLIER, of Yreka, California. Mr. MORETTI stated that
if a close scrutiny of Senator DILLS, Senator SONG, and
former Senator COLLIER's campaign contributions are made,
it will reveal that numerous large contributors to their
respective campaigns have paid as much or more in con-
cealed contributions to these men through intermediaries
and/or lobbyists who represent them. Mr. MORETTI further
suggested that these men have established unsavory
reputations for intimidating lobbyists and their clients
to purchase fund raiser dinner tickets. He stated that
in many instances those whom the aforementioned Senators
approach for dinner tickets to fund raisers know that
by refusing to buy upwards of \$5,000 worth of tickets,
they stand to possibly lost their ability to move favorable
legislation in behalf of the clients of the lobbyists.

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Mr. MORETTI stated that he welcomes the FBI's
inquiries and feels that if they pursue investigations
of Senators DILLS, SONG, and COLLIER, that they will
receive considerable information from various lobbyists
and principal campaign supporters of these three men who
have long been intimidated to support their respective
campaigns.

Mr. MORETTI concluded that, to the best of
his recollection, the additional information regarding
[redacted] is the only other bribe
offer made to him which he can now recall. He stated

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that he will continue to reflect on the period in elected office and should another bribe situation come to mind, he will contact the interviewing Agents.

FEDERAL BUREAU OF INVESTIGATION

1

Date of transcription 9/26/77

ROBERT MORETTI, Commissioner, California Energy Resources Conservation and Development Commission, was interviewed at his office, 1111 Howe Avenue, Sacramento, California, telephone 322-3690. MORETTI furnished his home address as 1500 39th Street, Sacramento, telephone 457-1322.

MORETTI was advised that the interviewing agents had been discussing the information he furnished to the FBI with the U.S. Attorney's office, Sacramento. He was then given a subpoena ordering him to appear before the Federal Grand Jury, Eastern District of California, on September 28, 1977, at 1:00 PM. MORETTI advised this would not be convenient for him; however, he consented to rearrange his own schedule in order to appear.

MORETTI advised he was concerned over his expected testimony and wondered if it would ruin the lives of the men about whom he would testify. MORETTI was told that no one involved in this investigation would be indicted solely on the basis of his testimony, nor would anyone be privy to the information furnished by him to the Federal Grand Jury.

At this point, MORETTI was advised of his rights, at which time he read and signed an Advice of Rights form. MORETTI was then asked if he could recall any other allegations which he omitted mentioning during previous interviews. MORETTI stated he has been completely honest with the interviewing agents, and he could think of no other incident which should be reported.

MORETTI was then asked where the actual bribe offers which he related in earlier interviews had actually taken place. He advised the bribe offer from JEFFERSON PEYSER took place in the office of the Speaker of the Assembly. He stated the bribe offer made by DONALD KENT BROWN was also made in the office of the Speaker of the Assembly. He stated his secretary let BROWN into the office, and the entire conversation with BROWN lasted between five and seven minutes. He further advised the bribe offer made by [redacted] also took place in the office of the Speaker of the Assembly.

Interviewed on 9/23/77 at Sacramento, California File # SC 183-94
1-SC 183-79
by SA JOHN F. MULLIGAN and
SA NORBERT R. LINKER JFM:smd 23 Date dictated 9/26/77
Ronald Reagan-4399

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MORETTI further advised that the offer made by [redacted] (last name unknown) took place when MORETTI was a freshman assemblyman. He stated after hearing the offer of \$175,000 for twenty years, he was incredulous, and he relayed the offer to JESSE UNRUH. UNRUH told MORETTI that he would not bring this matter to the attention of President JOHNSON and therefore, MORETTI was to recontact [redacted] and tell him there was no deal. MORETTI stated he relayed the message to [redacted] however, he does not recall where this meeting took place.

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At the conclusion of the interview, MORETTI stated he has heard a persistent rumor regarding illegal campaign contributions used during the campaign of JERRY BROWN. He stated four or five people whom he could not identify have related to him that [redacted] who is [redacted] [redacted] picked up \$30,000 or \$50,000 from a prominent Mexican businessman for use in the JERRY BROWN campaign. He advised these funds were not reported, and the cash was either put into petty cash funds or dummy contributors were set up to report the contribution. He further advised [redacted] [redacted] and worked for the [redacted] [redacted] He also recalled that the prominent Mexican businessman may have been living in Baja California.

MORETTI advised he would be quitting his job with the Energy Commission on September 30, 1977, and would begin working as a partner in Yorkshire Trading Corporation, Sacramento. He stated his partner in this venture is CHUCK MANNATT.

SC 183-94

LOBBYING BACKGROUND OF DONALD KENT BROWN
AND JEFFERSON PEYSER AND LEGISLATION
INVOLVED IN BRIBE OFFERS

FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 1/27/77

Mr. DAVID PITMAN, Office Manager, Political Reform Division, Office of the California Secretary of State, was interviewed to determine what records are maintained by his department relative to registered lobbyists in the State of California. Mr. PITMAN advised that there are approximately 600 registered lobbyists all of whom are required to register on an annual basis with the Secretary of State. PITMAN stated that the Political Reform Act of 1974, has created considerable difficulty and confusion among lobbyists as certain aspects of that law are not clear as to the lobbyists prohibitions on campaign contributions on behalf of clients. Mr. PITMAN stated that the Fair Political Practices Commission is the State Government agency which oversees questionable dealings by lobbyists at the present time. He stated that the Fair Political Practices Commission, 1100 "K" Street, Sacramento, California, regularly receives complaints from various segments of the population concerning alleged concealed contributions and violations of the aforementioned Political Reform Act on which they immediately initiate an investigation on in an attempt to resolve.

Mr. PITMAN was then questioned as to whether he was personally familiar with California Lobbyist DONALD KENT BROWN. Mr. PITMAN stated that Mr. DONALD KENT BROWN has been a lobbyist on the Sacramento scene for several years and represents many large and influential corporations. PITMAN, thereafter, secured BROWN's file maintained at his office and presented it to the interviewing Agents for their review. As DONALD KENT BROWN's file was reviewed, Mr. PITMAN offered that all lobbyists are required to submit "Interim Lobbyist Reports" to his office every two months. He stated that the Interim Reports reflect the monies expended by the lobbyists

Ronald Reagan-4402

Interviewed on 1/24/77 at Sacramento, California File # LA 183-169
183-250

by SA RICHARD DONNER and
SA NORBERT R. LINKER/NRL/mtk/lkp 26 Date dictated 1/26/77

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in behalf of clients; the lobbyists' names and addresses; the fees received from the clients during the preceding two month period; and the cumulative totals received by the lobbyists from their individual clients over the given year in which the report is being submitted.

Mr. PITMAN stated that in the case of DONALD KENT BROWN a degree of confusion is found in maintaining his, (BROWN's), reports in that BROWN is operating as an independent lobbyist but is also incorporated under the name of Advocation, Incorporated, and for that reason two separate files are maintained at his office for BROWN and his corporation. Mr. PITMAN directed the Agents' attention to the most recent filings by DONALD KENT BROWN for himself and his corporate operation known as Advocation, Incorporated. In the case of the filings for BROWN, it was noted that the block stamp is dated February 2, 1977, and covers the period October 1, 1976, through December 31, 1976. The aforementioned Interim Report will be made an attachment to this FD-302; however, the following are the pertinent areas of the form:

Name	DONALD KENT BROWN
Business Telephone Number	916-447-8229
Business Address	1127 - 11th Street Suite 544 Sacramento, California

Clients reflected on BROWN's individual filing are as follows:

(A) SUMMA CORPORATION
Post Office Box 14000
Las Vegas, Nevada

For the reporting period of
October 1, 1976, through
December 31, 1976:

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Received \$7,164.00 in salaries, fees, retainers; \$3,412.00 in expenses; cumulative total of expenses and salaries of \$42,909.00 for the year of 1976.

(B) HUGHES AIR CORPORATION
(Hughes Air West)
3125 Clearview Way
San Mateo, California

For the reporting period of
October 1, 1976, through
December 31, 1976:

Received \$2,224.00 in salaries, fees, retainers; \$39.00 in expenses; cumulative total of expenses and salaries of \$6,840.00 for the year of 1976.

Mr. PITMAN thereafter made available Mr. DONALD KENT BROWN's most recent filings with his office, dated November 16, 1976, for his lobbying firm, doing business as Advocation, Incorporated. The significant areas of that file reflect a business telephone number for Advocation, Incorporated, as 447-8229, with business address of 1127 - 11th Street, Sacramento, California.

During the reporting period of September 1, 1976, through September 30, 1976, the following are the listed clients of DONALD KENT BROWN for Advocation, Incorporated:

For
Donald K. Brown for
ADVOCATION, INC.

EXPENSES INCURRED IN CONNECTION WITH LOBBYING ACTIVITY (Amounts may be rounded off to whole dollars)

	(a)	(b)	(c)	(d)	(e)
NAME AND ADDRESS OF EMPLOYER OR CLIENT	SALARIES, FEES, RETAINERS	REIMBURSE- MENT OF EXPENSES	ADVANCES OR OTHER RECEIPTS (Attach Explanation)	TOTAL THIS PERIOD	CUMULATIVE TOTAL TO DATE
Bay Area Sewage Services Ag. Claremont Hotel Ashby & Domingo Berkeley, California 94705	\$2,000	0	0	0	\$7,800.00
California Housing Council 1650 Borel Place, Suite 102 San Mateo, CA 94402	\$2,583	399	0	2,982	24,088.00
Calif. Independent Mortgage Brokers Association 13135 Ventura Blvd., #301 Studio City, CA 91604	5,000	0	0	5,000	24,381.00
Calif. Independent Oil Marketers Association 555 Capitol Mall, Suite 755 Sacramento, CA 95814	750	21	0	771	7,181.00
Calif. Society of Radiologic Technologists 6500 Valley View Road Oakland, California 94611	500	0	0	500	1,379.00
The Nik-O-Lok Company 422 E. New York Indianapolis, Ind. 46202	750	0	0	750	6,797.00
Pharmaceutical Manufacturers Association 1155 - 15th Street, N. W. Washington, D. C. 20005	2,083	0	0	2,083	19,440.00
G. D. Searle & Co., Inc. Box 1045 Skokie, Illinois 60076	250	0	0	250	15,130.00
Cole National Corporation 18903 South Miles Road Cleveland, Ohio 44128	0	0	0	0	15,180.00
Schio Transportation Corporation of California 4201 Long Beach Boulevard Long Beach, CA 90807	3,000	0	0	3,000	13,710.00
Atlantic Richfield Co. 515 S. Flower Street #4013 Los Angeles, CA 90071	12,500	0	0	12,500	12,500.00
			Ronald Reagan-4405		
Dow Chemical U.S.A. 925 L Street, #1425	9,500	29	0	9,500	9,500.00

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During the course of the review of the Advocation, Incorporated, file and DONALD KENT BROWN's file maintained at Mr. PITMAN's office, he directed the Agents' attention to the State of California Franchise Tax Board "Audit Report for Lobbyist" which pertains to Mr. BROWN's operation and which is routinely audited on an annual basis. A copy of the California Franchise Tax Board audit was secured from Mr. PITMAN and will be attached to this FD-302.

The review of Mr. BROWN's files revealed that in his representation of the Summa Corporation, his contact with that firm is Mr. JAMES F. LESAGE, Post Office Box 309, Las Vegas, Nevada, and that his representation of the Summa Corporation as a lobbyist in Sacramento, California, pertains to legislation dealing with real properties, highways, and gambling.

His files further reflected that in his representation of the Cole National Corporation, his contact with that firm is with an unidentified officer at the firm's business address of 18903 South Miles Road, Cleveland, Ohio, telephone number 216-475-8925. The file reflects that Mr. BROWN's representation on behalf of Cole of Sacramento pertains to Ophthalmic Goods and Duplication of Keys.

The file reflected that in Mr. BROWN's representation of the Pharmaceutical Manufacturers Association his representative in that firm is Mr. BRUCE J. BRENNAN at the Pharmaceutical Manufacturers Association office at 1155 - 15th Street, Northwest, Washington, D.C.

In Mr. BROWN's files he reflects that he also is a retained lobbyist for the Sohio Transportation Corporation of California, located at 4201 Long Beach Boulevard, Long Beach, California; the Atlantic Richfield Corporation (ARCO),

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at 515 South Flower Street, Los Angeles, California; Dow Chemical U.S.A., 925 "L" Street, Sacramento, California. Mr. PITMAN advised that it appears that Mr. BROWN represents some extremely large corporations and by virtue of their size would derive a sizable income in his capacity as a lobbyist. PITMAN stated that there is considerable competition among lobbyists in Sacramento, each of whom is vying for the larger accounts as their volume of activity in connection with pending legislation would enable them to receive a high retainer fee. Mr. PITMAN cited the fact that Mr. BROWN represents the Summa Corporation, Sohio Transportation Corporation of California, ARCO, and Dow Chemical, which are classified as four major corporations operating throughout the United States.

Mr. PITMAN stated that [redacted] in his office, one [redacted], terminated her employment with the Secretary of State's office approximately two years ago and joined Mr. DONALD KENT BROWN's operation, at that point in time. According to PITMAN, [redacted] has subsequently left the employment of Mr. DONALD KENT BROWN and is understood to currently reside with her husband, [redacted], in a Sacramento suburban community known as Clarksburg, California. Mr. PITMAN stated that [redacted] may be in a position to offer additional information concerning Mr. DONALD KENT BROWN. PITMAN suggested, however, that [redacted] is an incessant talker and may reveal her contact with the Federal Bureau of Investigation (FBI) to Mr. BROWN.

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The following are documents made available by Mr. DAVID PITMAN concerning the two separate lobbyist's activities by Mr. DONALD KENT BROWN, which are herewith attached:

DONALD KENT BROWN's filings for
Advocation, Incorporated, for
the period September 1, 1976,
through September 30, 1976

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DONALD KENT BROWN's filings for
his lobbyist activities for the
period October 1, 1976, through
December 31, 1976

A copy of a five-page California
Franchise Tax Board Audit of
DONALD KENT BROWN



FORM 625

(Interim Form)
LOBBYIST REPORT—SHORT FORM

(GOVERNMENT CODE SECTION 86107)

THIS FORM MAY BE USED ONLY IF YOU ENGAGED IN NO REPORTABLE EXCHANGES

(If there were exchanges, use Form 620)

Period 10 / 1 / 1976 through 12 / 31 / 1976Cumulative Period January 1, 1976 through 12 / 31 / 1976**RECEIVED
AND FILED**In the office of the Secretary of State
of the State of California**FEB 02 1977**

Brown, Donald Kent

(916) 447-8229

MARCH FONG EU, Secretary of State

NAME (LAST) (FIRST) (MI) (AREA CODE) BUSINESS PHONE
1127 - 11th Street, Suite 544 Sacramento, California 95814
BUSINESS ADDRESS (NO. AND STREET) (CITY) (STATE) (ZIP CODE)

Same as above

MAILING ADDRESS (IF DIFFERENT THAN ABOVE)

FOR OFFICIAL USE ONLY

A

B

LOBBYIST ACTIVITIES

SPECIFIC DESCRIPTION OF LEGISLATION (BILL #) OR ADMINISTRATIVE ACTION INFLUENCED OR ATTEMPTED TO INFLUENCE	AGENCY INVOLVED
None	

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

PAYMENTS RECEIVED IN CONNECTION WITH LOBBYING ACTIVITY (Amounts may be rounded off to whole dollars)

PAYMENTS RECEIVED IN CONNECTION WITH LOBBYING ACTIVITY (AMOUNTS MAY BE DIFFERENT FROM THOSE REPORTED ON FORM 278E)						
		(a)	(b)	(c)	(d)	(e)
OFFICIAL USE ONLY	NAME AND ADDRESS OF EMPLOYER OR CLIENT	SALARIES, FEES, RETAINERS	REIMBURSE- MENT OF EXPENSES	ADVANCES OR OTHER RECEIPTS (Attach Explanation)	TOTAL THIS PERIOD	CUMULATIVE TOTAL TO DATE
	SUMMA Corporation P. O. Box 14000 Las Vegas, Nevada 89156	\$7,164 *	\$3,412 *	-0-	\$10,576	\$42,909
	Hughes Air Corp. 3125 Clearview Way San Mateo, CA 94403	2,224 *	39 *	-0-	2,263	6,840

NAME OF ACCOUNT: DONALD K. BROWN - Ledger Account.

*Apportioned amount of fee and expenses on lobbying.

DEPOSITS (POSTINGS) TO THE ACCOUNT; SUMS RECEIVED FOR THE PURPOSE OF PAYING EXPENSES (SECTION 86105)
Instructions: List here all funds received by the lobby account for the purpose of paying reportable expenses. Include your own funds "advanced" to the account for payments of reported items if such advances were necessary. Do not list fees, retainers or reimbursements unless deposited or posted to the account.

NAME OF SOURCE	ADDRESS	AMOUNT
Donald Kent Brown (aka Advocation, Inc.)	1127 - 11th St., Suite 544, Sacramento, CA 95814	\$4,573

TOTAL DEPOSITS (POSTINGS) OF RECEIPTS TO THE ACCOUNT THIS PERIOD

4,573

VERIFICATION

\$

THERE WERE NO EXCHANGES WITH INDIVIDUALS OR ENTITIES SPECIFIED IN SECTIONS 86107 (d) or (e) WHICH WOULD BE REPORTABLE THIS MONTH PURSUANT TO THESE SECTIONS. (You must file a Form 620 if you had any such exchanges)

C I DECLARE UNDER PENALTY OF PERJURY THAT THIS REPORT AND THE ATTACHED SCHEDULES ARE TO THE BEST OF MY KNOWLEDGE TRUE, CORRECT AND COMPLETE AND THAT I HAVE USED ALL REASONABLE DILIGENCE IN THEIR PREPARATION.

D Executed on 1/28/77 at Sacramento, CA by Donald K. Brown
(DATE) (CITY AND STATE) (SIGNATURE OF LOBBYIST)

Ronald Reagan-4405

PAYMENTS (POSTINGS) FROM THE ACCOUNT; REPORTABLE EXPENSES INCURRED BY THE LOBBYIST FOR THE PERIOD (SECTION 86106)

Schedule (i) Instructions: In this schedule show all reportable payments other than Overhead (Schedule ii) or Petty Cash (Schedule iii). "Payments" include charges to credit cards or open accounts for items required to be reported in this Schedule even if not paid in cash at month end regardless of whether you or your employer will make the actual payment. Do not report the actual payment for items listed in previous reports.

DATE	NAME AND ADDRESS OF PAYEE	NAME AND ADDRESS OR OFFICIAL POSITION OF BENEFICIARY (If other than Payee or Filer)	DESCRIPTION OF CONSIDERATION	AMOUNT
10/23	Vario's 1695 South Virginia Reno, Nevada	Frank Fahrenkopf & self (\$11.98 each)	Dinner	\$ 24
11/17	A. J. Bump's 8055 Freeport Blvd. Sacramento, CA	Leah Cartabruno & self (\$8.65 each)	Dinner	17
11/20	Fat City 1001 Embarcadero Sacramento, CA	Dr. P. Grignon & self (\$7.46 each)	Lunch	15

TOTAL FOR SCHEDULE (i). \$ 56

Schedule (ii) — OVERHEAD

See Exhibit A

Instructions: List payments incurred by you in lump sum amounts within the following broad categories:

a) Wages, benefits and payroll taxes \$ 707
b) Telephone 1,357
c) Rent and Utilities -0-
d) Other Office Expense 1,877
e) Personal Maintenance Expenses: 417
Actual costs for the period

OR

Per Diem at \$ 25 for 1 days 25
\$.20 per mile for 672 miles 134
TOTAL FOR SCHEDULE (ii) \$ 4,517

Schedule (iii) — PETTY CASH

a) Activity expense paid from petty cash \$ -0- (*)
b) Items over \$10 paid from petty cash -0- (*)
c) Total of other petty cash payments -0-
TOTAL FOR SCHEDULE (iii) \$ -0-

* Attach schedule showing name of payee, nature of expense and the name and address or official position of the beneficiary.

SUMMARY

PAYMENTS FOR THE MONTH

Schedule (i) \$ 56
Schedule (ii) 4,517
Schedule (iii) -0-
Total "payments" this month \$ 4,573

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CASH POSITION [SECTION 86107(b)(5)]

(Complete this schedule if your lobby account is a designated bank account.)

Cash in account, start of period \$
Add: Amount deposited
Less: Cash payments from account
Cash Balance end of month \$

EXHIBIT A
FORM 625
Donald Kent Brown

Period 10/ 1 /1976 through 12/31 /1976

Donald Kent Brown is a lobbyist. He is also an employer of a lobbyist and therefore the following additional information is given in lieu of filing a Form 650. (2 Cal Admin Code § 18619)

Payments made to Lobbyists Employed or Retained:

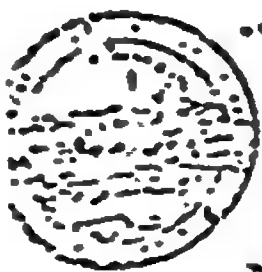
<u>Full Name of Lobbyist</u>	<u>Salaries, Fees, Retainers</u>	<u>General Expenses</u>	<u>Special Expenses</u>	<u>Total this Period</u>	<u>Cumulative to Date</u>
C. W. (Nick) Medeiros	\$300	-0-	-0-	\$300	\$1,000

Lobbying Activities - None this period.

Campaign Contributions - None

Payments to Influence - None but see Payments on Lobbyist Report

Exchanges - None, but see Schedule B of Lobbyist Report if Form 620 is filed.



(Interim Form)

LOBBYIST REPORT—SHORT FORM

(GOVERNMENT CODE SECTION 85107)

THIS FORM MAY BE USED ONLY IF YOU ENGAGED IN NO REPORTABLE EXCHANGES THIS MONTH ED
AND FILED

(If there were exchanges, use Form 620)

Period 9 / 1 / 1976 through 9 / 30 / 1976Cumulative Period January 1, 1975 through 9 / 30 / 1975In the office of the Secretary of State
of the State of California

NOV 16 1976

Donald K. Brown for ADVOCATION, INC. (916) 447-8229

NAME (LAST) (FIRST) (MI) (AREA CODE) BUSINESS PHONE
127 - 11th Street Sacramento, California 95814BUSINESS ADDRESS (NO. AND STREET) (CITY) (STATE) (ZIP CODE)
Same as above.

MAILING ADDRESS (IF DIFFERENT THAN ABOVE)

Also see Brown, Donald Kent Lobbyist Report
Lobbyist Activities

ARCH FONG EU, Secretary of State

FOR OFFICIAL USE ONLY

A

B

SPECIFIC DESCRIPTION OF LEGISLATION (BILL #) OR ADMINISTRATIVE
ACTION INFLUENCED OR ATTEMPTED TO INFLUENCE

AGENCY INVOLVED

Legislature

Governor

AB 3788

ATTACH ADDITIONAL INFORMATION ON APPROPRIATELY LABELED CONTINUATION SHEETS

PAYMENTS RECEIVED IN CONNECTION WITH LOBBYING ACTIVITY (Amounts may be rounded off to whole dollars)

OFFICIAL USE ONLY	NAME AND ADDRESS OF EMPLOYER OR CLIENT	SALARIES, FEES, RETAINERS	REIMBURSE- MENT OF EXPENSES	ADVANCES OR OTHER RECEIPTS (Attach Explanation)	TOTAL THIS PERIOD	CUMULATIVE TOTAL TO DATE
	See Exhibit B, attached					

NAME OF ACCOUNT: ADVOCATION, INC. - LEDGER ACCOUNTDEPOSITS (POSTINGS) TO THE ACCOUNT; SUMS RECEIVED FOR THE PURPOSE OF PAYING EXPENSES (SECTION 85107)
Instructions: List here all funds received by the lobby account for the purpose of paying reportable expenses.
Include your own funds "advanced" to the account for payments of reported items if such advances were necessary.
Do not list fees, retainers or reimbursements unless deposited or posted to the account.

NAME OF SOURCE	ADDRESS	AMOUNT
Advocation, Inc.	1127 - 11th Street, Suite 544, Sacramento, CA	\$9,127

TOTAL DEPOSITS (POSTINGS) OF RECEIPTS TO THE ACCOUNT THIS PERIOD

VERIFICATION

\$ 9,127

THERE WERE NO EXCHANGES WITH INDIVIDUALS OR ENTITIES SPECIFIED IN SECTIONS 85107 (d) or (e) WHICH WOULD BE
REPORTABLE THIS MONTH PURSUANT TO THESE SECTIONS. (You must file a Form 620 if you had any such exchanges)I DECLARE UNDER PENALTY OF PERJURY THAT THIS REPORT AND THE ATTACHED SCHEDULES ARE TO THE BEST OF MY
KNOWLEDGE TRUE, CORRECT AND COMPLETE AND THAT I HAVE USED ALL REASONABLE DILIGENCE IN THEIR PREPARATION

11/12/76

Sacramento, CA

Ronald Reagan 4412

Schedule (i) Instructions: In this schedule show all reportable payments other than Overhead (Schedule ii) Cash (Schedule iii). "Payments" include charges to credit cards or open accounts for items required in this Schedule even if not paid in cash at month end regardless of whether you or your employer will make the actual payment. Do not report the actual payment for items listed in prior periods.

DATE	NAME AND ADDRESS OF PAYEE	NAME AND ADDRESS OF OFFICIAL POSITION OF BENEFICIARY (if other than Payee or Filer)	DESCRIPTION OF CONSIDERATION	AMOUNT
9/24/76	Zims Market and Van Ness Ave. San Francisco	(\$4.50 each) Assemblyman Lou Papan & self	Lunch	\$9.00
9/27/76	Senator Hotel 12th & L Streets Sacramento, CA 95814	Assemblyman Lou Papan & self (\$4.59 each)	Lunch	\$9.00

TOTAL FOR SCHEDULE (i) \$ 18.00

Schedule (ii) — OVERHEAD

Instructions: List payments incurred by you in lump sum amounts within the following broad categories:

a) Wages, benefits and payroll taxes	\$ 7,303.00
b) Telephone	654.00
c) Rent and Utilities	515.00
d) Other Office Expense	230.00
e) Personal Maintenance Expenses:	
Actual costs for the period	188.00

OR

Per Diem at \$25 for 2 days	50.00
\$.20 per mile for 767 miles	153.00

TOTAL FOR SCHEDULE (ii) \$ 9,093.00

Schedule (iii) — PETTY CASH

a) Activity expense paid from petty cash	SEE ATTACHED EXHIBIT C	\$ 0
b) Items over \$10 paid from petty cash	12.00	
c) Total of other petty cash payments	4.00	
TOTAL FOR SCHEDULE (iii)		\$ <u>16.00</u>

* Attach schedule showing name of payee, nature of expense and the name and address or official position of the beneficiary.

SUMMARY

PAYMENTS FOR THE MONTH

Schedule (i)	\$ 18.00
Schedule (ii)	9,093.00
Schedule (iii)	16.00

Total "payments" this month . . . \$ 9,127.00 37

CASH POSITION [SECTION 26107(b)(5)] (Complete this schedule if your lobby account is a designated bank account.)

Cash in account, start of period	\$
Add: Amount deposited	
Less: Cash payments from account	
Cash Balance end of month	\$

Ronald Reagan 4413

ATTACHMENT TO FORM 625 - LOBBYIST REPORT
For Donald K. Brown for Advocation, Inc.

Period 9 /1/76 through 9 /30 /76
Filed in lieu of filing Form 650 - 2 Cal Admin Code § 18619

Donald Kent Brown for Advocation, Inc. is a lobbyist. He is also an employer of a lobbyist and therefore the following additional information is given in lieu of filing a Form 650.

PAYMENTS MADE TO LOBBYISTS EMPLOYED OR RETAINED:

Full Name of Lobbyist	Salaries, Fees, Retainers	General Expenses	Special Expenses	Total this Period	Cumulative Tot to Date
C. W. (Nick) Medeiros	\$2,250	-0-	-0-	\$2,250	\$22,480
					38

LOBBYING ACTIVITIES (See Exhibit A of Lobbyist Report)

CAMPAIGN CONTRIBUTIONS - None

PAYMENTS TO INFLUENCE None but see Payments on Lobbyist Report

EXCHANGES - None, but see Schedule B of Lobbyist Report if Form 620 is filed.

I declare under penalty of perjury that this report is to the best of my knowledge true, correct and complete and that I have used all reasonable diligence in its preparation.

Executed on November 12, 1976 at Sacramento, California.

By: Donald K. Brown
Donald K. Brown

For.
Donald K. Brown for
ADVOCATION, INC.

PAYMENTS RECEIVED IN CONNECTION WITH LOBBYING ACTIVITY (Amounts may be rounded off to whole dollars)

OFFICIAL USE ONLY	NAME AND ADDRESS OF EMPLOYER OR CLIENT	(a) SALARIES, FEES, RETAINERS	(b) REIMBURSE- MENT OF EXPENSES	(c) ADVANCES OR OTHER RECEIPTS (Attach Explanation)	(d) TOTAL THIS PERIOD	(e) CUMULATIVE TOTAL TO DATE
	Bay Area Sewage Services Ag. Claremont Hotel Ashby & Domingo Berkeley, California 94705	\$2,000	0	0	0	\$7,800
	California Housing Council 1650 Borel Place, Suite 102 San Mateo, CA 94402	\$2,583	399	0	2,982	24,088
	Calif. Independent Mortgage Brokers Association 13135 Ventura Blvd., #301 Studio City, CA 91604	5,000	0	0	5,000	24,381
	Calif. Independent Oil Marketers Association 555 Capitol Mall, Suite 755 Sacramento, CA 95814	750	21	0	771	7,181
	Calif. Society of Radiologic Technologists 6500 Valley View Road Oakland, California 94611	500	0	0	500	1,379
	The Nik-O-Lok Company 422 E. New York Indianapolis, Ind. 46202	750	0	0	750	6,797
	Pharmaceutical Manufacturers Association 1155 - 15th Street, N. W. Washington, D. C. 20005	2,083	0	0	2,083	19,44
	G. D. Searle & Co., Inc. Box 1045 Skokie, Illinois 60076	250	0	0	250	15,13
	Cole National Corporation 18903 South Miles Road Cleveland, Ohio 44128	0	0	0	0	15,18
	Schio Transportation Corporation of California 4201 Long Beach Boulevard Long Beach, CA 90807	3,000	0	0	3,000	13,71
	Atlantic Richfield Co. 515 S. Flower Street #4013 Los Angeles, CA 90071	12,500	0	0	12,500	12,50
	Dow Chemical U.S.A. 925 L Street, #1425 Sacramento, CA 95814	9,500	0	0	9,500	9,50

EXHIBIT C
Form 625

Donald K. Brown for Advocacy, Inc.
Lobbyist Report
Period 9/1/76 - 9/30/76

Schedule (iii) (b)

<u>DATE</u>	<u>PAYEE</u>	<u>NATURE OF EXPENSES</u>	<u>BENEFICIARY</u>	<u>AMOUNT</u>
9/10	Greyhound	Shipping of Stationary & office supplies	Adv. Inc. 1127-11th St., #544 Sacramento, CA	\$12.00

TOTAL OF SHCEDULE (iii) (b)
this period \$12.00

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SC 183-48
JFM/kmc

On April 15, 1977, the following investigation was conducted by SA JOHN F. MULLIGAN:

AT SACRAMENTO, CALIFORNIA:

A check of the records of the California State Archives, 1020 O Street, Sacramento, revealed that in 1971 Assembly Bill #946 was introduced by Assemblymen CORY, WOOD, and LACOSTE. This bill was entitled "Agricultural Labor Relations Act of 1971." These records revealed that this bill was released from the Ways and Means Committee without further action.

A check of the records of the State Archives also revealed that in 1971, [REDACTED], was registered as a lobbyist for the California Tax Payers Association. These records also revealed that JEFFERSON PLYSER was a registered lobbyist during the period of 1971 through 1973 for the Mortgage Brokers Institute, the Wine Institute, and the California Real Property Loan Brokers Association.

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A check of the California Law Enforcement Telecommunications System (CLETS) revealed the following background information regarding JEFFERSON EDWIN PEYSER:

Race:	White
Sex:	Male
Height:	5'8"
Weight:	170
Hair:	Gray
Eyes:	Brown
California driver's license:	#B407079
Address (as of October 4, 1976):	1200 California San Francisco, California

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SC 183-79
JFM/kmc

The following investigation was conducted by
SA JOHN F. MULLIGAN.

AT SACRAMENTO, CALIFORNIA:

On April 26, 1977, a request was made at the State of California Library, Sacramento, for all records regarding lobbyists and all legislative advocates for the years 1966 through 1976. It was determined that the only records available at the State Library were listings of individuals registered as legislative advocates for those years. It was also determined that the State Library had no records or listings for lobbyists for the years 1966 and 1968.

A review of the Legislative Advocates and Organizations Directories of 1967 revealed no listing for a lobbyist representing Tenneco, Inc.

The following information regarding DONALD K. BROWN, Lobbyist, was extracted from the Legislative Advocates and Organizations Directories for the years indicated:

In 1972 DONALD K. BROWN was a lobbyist representing: Comprehensive Health Systems, Inc.; Robert R. Mullen Company; and Union Bank.

In 1973 DONALD K. BROWN was a lobbyist representing: Anthony Industries, Inc.; Robert R. Mullen Company; and Sayre & Fisher Company.

In 1975 through 1976 DONALD K. BROWN was a lobbyist representing: Anthony Industries, Inc.; Bay Area Sewage Service Agency; California Independent Mortgage Brokers Association; Huges Airwest; G. D. Searle & Company; Pharmaceutical Manufacturers Association.

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The following information regarding JEFFERSON E. PEYSER was extracted from the Legislative Advocates and Organizations Directories for the years indicated:

In 1971 PEYSER represented: Mortgage Brokers Institute; and Wine Institute.

In 1972 PEYSER represented: Mortgage Brokers Institute; and Wine Institute.

In 1973 and 1974 PEYSER represented: California Real Property Loan Brokers Association; and Wine Institute.

SC 183-94

INTERVIEW OF DONALD KENT BROWN AND
CONTACTS WITH BROWN'S ATTORNEYS

FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 6/24/77

Mr. DONALD KENT BROWN, registered California Lobbyist, appeared at the Sacramento Office of the Federal Bureau of Investigation (FBI) in the company of his attorney, VIGO G. NIELSEN, JR. At the outset of the interview Mr. BROWN was advised that the ensuing conversation dealt with alleged criminal activities on his part and others and that for that reason he was to be afforded his rights prior to the commencement of the interview. Thereafter, Mr. BROWN was advised of his rights, as set forth in Bureau form entitled "Interrogation; Advice of Rights," after which the document was read by BROWN and his attorney and thereafter signed by Mr. BROWN.

Mr. BROWN stated that he has been a registered lobbyist operating from offices in Sacramento, California, since 1972, and is currently retained by approximately 18 corporations and/or associations operating within the State of California. Mr. BROWN then offered the identities of his retained clients and the years that he was hired by them.

1972 -- Summa Corporation
Las Vegas, Nevada

1973 -- Hughes Air West

1977 -- Continental Airlines

1977 -- Flying Tiger Air Lines

1977 -- Associated Builders and Contractors

1975 -- California Independent Oil
Marketers Association

1973 -- California Independent Mortgage
Brokers Association

1976 -- California Orthotics and
Prosthetics Association

Interviewed on 6/15/77 at Sacramento, California File # Los Angeles 183-250
183-169

by SA JOHN F. MULLIGAN and
SA NORBERT R. LINKER/NRL/lkp 45 Ronald Reagan-4421 Date dictated 6/21/77

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- 1975 -- Nik-O-Lok Company
- 1977 -- H & R Block
- 1977 -- International Franchisers Association
- 1977 -- City of Industry
- 1976 -- Dow Chemical Corporation
- 1975 -- California Housing Council
- 1974 -- Pharmaceutical Manufacturers Association
- 1975 -- G. D. Searle, Incorporated
- 1975 -- Cole National, Incorporated
- 1976 -- Sohio Oil Corporation

Mr. BROWN advised that his offices are currently located at 1127 - 11th Street, Suite 544, Sacramento, California, telephone number 916-447-8229, and that he has an associate within his lobbying firm, Mr. C. W. (NICK) MEDEIROS, who has been affiliated with him for the past two years.

Mr. BROWN was advised that allegations received by the FBI indicated that he has made numerous suspect political contributions to elected State officials including Senators and Assemblymen prior to and subsequent to the passage of the California Political Reform Act of 1974, which became effective as law on January 1, 1975. Mr. BROWN was further advised that in this area of the inquiry the Agents had received information indicating that he, BROWN, had distributed large sums of money to California Legislators in a clandestine manner on behalf

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of his client the Summa Corporation. Mr. BROWN advised that he was retained as the registered lobbyist for the Summa Corporation in 1972 through a public relations firm, the Robert R. Mullen Corporation of Washington, D.C. He stated that a Mr. ROBERT F. BENNETT, then with the Mullen Corporation, retained him on behalf of Summa to represent their real estate interests, highway legislation, and gambling legislation in the State of California. BROWN stated that approximately one year after having been hired by Mullen, and specifically BENNETT of that company, BENNETT joined Summa Corporation at its offices in Las Vegas, Nevada, after which time a NADINE HENLEY of Summa's Las Vegas operation became his contact. He stated that HENLEY was subsequently succeeded as his contact by one JAMES F. LESAGE who to the present time remains his contact with that corporation. BROWN stated that HENLEY and LESAGE have official titles as Governmental Affairs officers for the Summa Corporation and among their assignments are liaison with lobbyists in the employ of Summa throughout the United States.

BROWN advised that prior to the passage of the Political Reform Act of 1974, he and other lobbyists were permitted to distribute political contributions to politicians and newly announced candidates which had been received from their clients. He stated that when the Political Reform Act of 1974 law became effective on January 1, 1975, it prohibited lobbyists from handling any political contributions between client and the intended political recipient.

BROWN stated that between 1972 and 1974, he and NADINE HENLEY of Summa Corporation would meet and discuss those incumbent politicians and newly declared candidates whom HENLEY and he felt would best serve the interests of Summa if elected to State offices in Sacramento. He stated that a list would be prepared and agreed upon by he and HENLEY as to whom Summa would be supporting with political contributions. He advised that shortly thereafter he would receive checks made payable to him and drawn on the personal bank accounts of HOWARD HUGHES in banks located in Houston, Texas. He stated that based on the

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format worked out with HUGHES, he would then deposit the HOWARD HUGHES checks into his own personal bank account at Sacramento, California, and then draw cashier's checks bearing his own name which he would then distribute to the politicians agreed upon earlier by he and HENLEY. BROWN stated that in distributing those cashier's checks he always made it a point to inform the politicians that the original source of the checks were either HOWARD HUGHES, the Summa Corporation, or subsidiary corporations.

BROWN stated that his position in this method of distributing political contributions was enhanced with the receiving politicians as any follow-ups made by him with them made it easier as Summa's lobbyist whenever legislation was introduced which affected his client.

BROWN advised that he could not offer any other logical explanation as to why this method of distributing political contributions was worked out other than to enhance his reputation as Summa's lobbyist.

BROWN stated that the possibility exists that retained lobbyists for the Summa Corporation in other States that contain Summa, Incorporated, interests may be operating in this manner of disbursing political contributions to the present time.

BROWN stated that he would "approximate" his distribution of cashier's checks on behalf of Summa to political candidates during the years 1972 to 1974 to be \$125,000. He stated that the Political Reform Act now requires that Summa make their contributions to political candidates direct rather than through their retained lobbyists.

Mr. BROWN was then asked what his relationship with the California Independent Mortgage Brokers Association is relative to that association's contributions to California State politicians.

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BROWN stated that the California Independent Mortgage Brokers Association (CIMBA) policies do not differ in any way whatsoever with his other retained clients in that the Political Reform Act to which he refers now makes it mandatory that the client direct his contributions to the politician rather than transmit the monies through their lobbyist. BROWN stated that he, however, is consulted by SIMBA and his other clients regarding whom he feels should be the recipient of any contributions. He offered, however, that should the client disagree with his opinion they can take it upon themselves to contribute to others than those which he suggested.

Mr. BROWN was then questioned as to what his relationship is with [REDACTED]

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Mr. BROWN stated that he has known [REDACTED] since 1963, at which time [REDACTED] was employed as an attorney for the law firm of [REDACTED]. He stated that both he and [REDACTED] have been actively involved in Democratic party matters since they have known each other. In this regard, BROWN offered that he was an Assistant State Treasurer from 1962 through 1967, under [REDACTED] and that his appointment was secured principally as the result of his active role for [REDACTED], a Democratic.

BROWN stated that [REDACTED] has since formed his own very successful law firm in Los Angeles, California, and in addition to being a leading spokesman in State Democratic politics has developed an area of specialty, namely the securing of State bank charters for clients.

Mr. BROWN stated that while the Assistant State Treasurer for California he was contacted by a friend, [REDACTED], who at that time was attempting to form a bank in the Newhall, California, area. Being

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aware of [] expertise in the field of bank charters, he referred [] to [], and [] subsequently was successful in securing a State bank charter for []. He stated that the bank in question is the Bank of Santa Clarita located in Newhall, California, and [] is presently a member of that Board of Directors.

Mr. BROWN stated that he did not consider his referral of [] to [] to secure his State bank charter a conflict of interest in that at that time he was an Assistant State Treasurer for California. Mr. BROWN stated that to the best of his recollection, [] was the only person seeking a bank charter whom he referred to [] while he was an Assistant State Treasurer.

Mr. BROWN stated that, to the best of his memory, he can not recall transmitting or suggesting to any of his retained clients since becoming a registered lobbyist that they make contributions to the Democratic State Central Committee which was headed by []. BROWN stated that he would research his documents to insure that he never personally transmitted monies to the Democratic State Central Committee on behalf of clients. b6 b7C

Mr. BROWN advised that subsequent to his position as Assistant California State Treasurer, he became involved in the formation of three other banks in California; namely, the Central Bank of Glendale, California, the Harbor Bank of Long Beach, and was retained as a consultant with the Bank of Chino Valley, for which he received a fee of \$6,000. Mr. BROWN stated that in the case of the Central Bank of Glendale, he was directly responsible for securing the services of [] and his law firm for the necessary applications and documentation for the bank's charter.

He advised that he played a principal role in organizing and gathering the necessary investment capital for the Harbor Bank of Long Beach, and at one point in time held 6,000 shares of that bank's stock which he sold six months subsequent to the bank's opening for a profit of approximately \$2.50 per share. BROWN pointed out that

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he secured a bank loan to acquire his Harbor Bank stock. He stated that as in the case of the Central Bank of Glendale, he was also instrumental in securing [redacted] law firm to secure the necessary documentation for the bank charter for that bank.

As an afterthought, Mr. BROWN offered that, as his memory serves him, [redacted] and/or his law firm acquired stock in both the Central Bank of Glendale and the Harbor Bank of Long Beach at a point in time when those institutions were seeking investors.

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BROWN advised that in the case of the Bank of Chino Valley, he received a \$6,000 consulting fee and, at one point in time, was a member of the board of that bank but did not own shares in that institution. He stated that, as his memory serves him, he was instrumental in securing [redacted] law firm for the purposes required to secure its bank charter from the State of California.

Mr. BROWN stated that the California State offices of Business and Transportation headed until recently by [redacted] is the State agency which oversees the issuance of State bank charters. Mr. BROWN pointed out that [redacted] has just recently terminated his position as [redacted]

Mr. BROWN was then asked whether he would offer a resume of his association with [redacted] of the Cerrel Public Relations firm based in Los Angeles, California.

BROWN stated that he has been acquainted with [redacted] since the early 1960s when both were actively involved in Democratic political election campaigns. He stated that he considers [redacted] to be a competent public relations man who has enjoyed considerable success in political campaigns to the present time.

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He stated that he and [] have both been retained by three clients for their respective abilities as lobbyists and public relations expert. He advised that the three clients who both he and [] were retained by were the G. D. Searle Corporation, the California Housing Council, and the Environmental Exporters Institute.

BROWN recalled that both he and [] also shared as clients the California Independent Mortgage Brokers Association, also known as SIMBA. [] further offered that [] has also handled some public relations matters for the Summa Corporation of Las Vegas, Nevada, as the result of a referral which he (BROWN) had made on behalf of []. BROWN stated that [] was retained by Summa attorney JAMES WADSWORTH, one of Summa's Las Vegas based attorneys, at the suggestion of BROWN.

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BROWN stated further that he and [] mutual client, the California Housing Council, was formed by []. Mr. BROWN stated that in his judgment it was merely coincidental that he was subsequently retained as the Sacramento lobbyist for the California Housing Council after that organization was principally formed by []. [] stated that his contact with the California Housing Council is [], who is [] and whose offices are located in San Mateo, California.

Mr. BROWN was then asked whether he would offer background on the Dow Chemical Company and his relationship with that corporation since becoming its legislative advocate in Sacramento. At that point [], offered that he had represented Dow in political affairs matters some four years ago, at which time he was in regular contact with Dow Chemical's Governmental Affairs Director, one [], who operated in behalf of Dow in their Western Regional offices. [] stated that as Dow's operations

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in California expanded, [] asked him whether he could refer him to a qualified and competent lobbyist in Sacramento who could best serve Dow's interests at the State capital. [] stated that he referred [] to DONALD KENT BROWN and contractual agreements were worked out to whereby BROWN then became Dow's lobbyist in Sacramento.

Mr. BROWN stated that Dow has recently encountered enumerable difficulties with the State of California in attempting to get the various approvals from State environmental agencies to build a \$500 million dollar facility in Northern California. BROWN stated that as it became apparent to the Dow Chemical Company that the obstacles in the environmental area were going to increase with the various State agencies, Dow decided to discontinue their efforts to build their aforementioned half billion dollar facility in the State of California, much to their regret. He stated that before Dow reached their decision to discontinue their efforts to build their plant in California, Dow had spent considerable monies in legal fees which proved to be futile. Mr. BROWN stated that he has never suggested to []

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[] that Dow direct any contribution to politicians at the local or State level of California politics in order to sway their decisions on the environmental problems connected with Dow's planned half billion dollar facility.

Mr. BROWN was then asked whether he would like to offer any information regarding the circumstances surrounding his retention by the Sohio Oil Corporation of Ohio.

Mr. BROWN stated that he has been retained by the Sohio Transportation Corporation of Long Beach, California, which is a subsidiary corporation of the Sohio Oil Corporation of Ohio. He advised that a

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[redacted] of Sohio Transportation of Long Beach is his contact regarding the parent corporation's efforts to secure oil receiving terminals at one or more ports in California which will hopefully receive Sohio's portion of the oil from the Northern slope of Alaska which will be tankard from the port of Valdes in Southern Alaska.

Mr. BROWN stated that he has had occasion to meet Sohio Oil Company's [redacted] when [redacted] has been in California, and recalls that on one occasion he and [redacted] had dinner together and discussed Sohio's problems at a restaurant in San Pedro, California. Mr. BROWN further offered that [redacted] has requested his opinions on between 10 and 20 occasions during the past year or so regarding political contributions which Sohio was interested in making to various political figures in the State legislature during the past year. Mr. BROWN stated that he offered his advice to [redacted] on these occasions when his opinions were solicited but did not know whether the Sohio Oil Corporation thereafter made contributions to those politicians for whom his advice was being sought.

Mr. BROWN was then asked whether he would offer any information regarding his acquaintanceship with State Assemblyman LOUIS J. PAPAN, current Chairman of the State Assembly Rules Committee.

Mr. BROWN advised that he has known Assemblyman PAPAN during the six years that he has been a member of the State Assembly, and considers him to be a friend. He stated that in cases where his clients have raised the question as to whether or not they should contribute to PAPAN's election campaigns he has unhesitatingly suggested that they do so in that he looks upon Assemblyman PAPAN as a highly qualified member of the State Assembly.

Mr. BROWN stated that Assemblyman PAPAN introduced Assembly Bill Number 933, which would have enacted legislation favorable to BROWN's client, the California Housing Council,

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in early 1977. He stated that essentially the bill would give the State of California statewide jurisdiction in the field of landlord/tenant relationships, particularly in the field of breach of leases, controls on rent, and discriminatory practices. BROWN stated that [REDACTED]

[REDACTED] had co-authored the Senate bill which did not reach the Senate subcommittee overseeing these matters, as Assembly Bill 933, introduced by Assemblyman PAPAN, was vetoed by Governor EDMUND G. BROWN, JR.

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BROWN again referred to his client, the California Housing Council, and advised that that organization has a political action committee which gathers funds separate and apart from dues collected from members and thereafter makes their own political contributions through the offices of [REDACTED]

[REDACTED] of the California Housing Council.

Mr. BROWN was then asked as to his degree of association and friendship with [REDACTED]

Mr. BROWN stated that he has known [REDACTED] for approximately six years and has frequently sought his advice on legislative matters affecting his clients which are being handled by the State Senate. Mr. BROWN offered as an example the fact that [REDACTED] was consulted by him in connection with Assemblyman PAPAN's Assembly Bill 933, and was prepared to vote for the Senate's version of that bill, number 3788, prior to the veto by Governor BROWN.

Mr. BROWN stated that approximately one year ago [REDACTED] informed him that [REDACTED]

[REDACTED] BROWN stated that after considerable conversation with [REDACTED] on this matter, BROWN decided to co-invest \$30,000 of his own capital in the development of [REDACTED] and, subsequently, contacted one [REDACTED] of Newport Beach, California, whom BROWN new to have been previously involved in real estate developments in Southern California.

Ronald Reagan-4431

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Mr. BROWN stated that [redacted] and he, had several conversations and on one or more occasions [redacted] and [redacted] met at [redacted] to plan certain aspects of the development. BROWN stated that [redacted] became very enthusiastic over the potential of the [redacted] project and planned to invest his own capital in the project.

BROWN stated that he subsequently discussed his planned investment in the [redacted] project [redacted]
[redacted]
[redacted].

BROWN stated that after apprising [redacted] of his plan to invest in this development venture with [redacted] strongly suggested that he discontinue this business association with [redacted] as the relationship would clearly be in violation of the State Political Reform Act of 1974. BROWN stated he complied with [redacted] suggestion and recently disassociated himself from the [redacted] project and [redacted].

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Mr. BROWN was then questioned as to his relationship with [redacted] of the [redacted]

Mr. BROWN advised that he personally recalls having made available cashier's checks to [redacted] which monies were contributions from either the Summa Corporation or Hughes Air West, which is a subsidiary company of Summa. BROWN stated that the contributions directed to [redacted] were, in his judgment, normal as Hughes Air West flies into the Orange County Airport on a daily scheduled basis. Mr. BROWN stated that he would estimate that he has given [redacted] approximately \$2,500 in political contributions since 1973, all of which were in the form of the aforementioned cashier's checks bearing his name. Mr. BROWN stated that [redacted] has never requested any type of

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LA 183-250

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political payoff to continue his support of Hughes Air West's operations at the Orange County Airport, nor has he ever offered [redacted] monies to continue that support.

Mr. BROWN was then told that the ensuing questions which were to be directed to him were a result of information which had been gathered from various sources, many of whom were prepared to testify to the truthfulness of their statements before a Federal Grand Jury or a Federal Court procedure. Mr. BROWN was further informed that, because of the seriousness of the allegations to which he had just been referred, he would be free to consult his attorney privately before rendering answers.

Mr. BROWN was then asked whether he has ever offered monies or other financial remuneration in the form of stock shares to any elected officials on behalf of retained clients in order to secure those elected officials' votes on matters affecting his clients.

Mr. BROWN stated that he has never offered any monies or stock interests to any elected officials on behalf of his retained clients.

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Mr. BROWN was then asked whether any elected or appointed officials-in the State of California, or elsewhere, had ever solicited or demanded monies from him and/or his clients for votes which would have favorably affected his retained clients.

At that point Mr. BROWN requested that he be permitted to confer privately with his attorney, [redacted]
[redacted]

[redacted] and Mr. BROWN conferred privately for approximately 25 minutes and upon their return to the interview room, [redacted] offered the following:

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[] stated that, based upon his conversation with his client, he had offered certain instructions. Among those instructions which he suggested was the fact that Mr. BROWN refrain from answering any further questions at this time. [] stated that he further recommended to Mr. BROWN that he secure the services of a criminal attorney to assist him in his further contacts with the Federal Bureau of Investigation (FBI). [] stated that being a civil attorney he can no longer represent BROWN confidently as the issues left unanswered are of a criminal nature and, for that reason, desired to terminate the interview at this point.

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Mr. BROWN thereafter advised the interviewing Agents that he was prepared to answer the last question which was directed to him, but agreed with [] in that he felt he should consult with a criminal attorney before completing the interview.

[] advised that he and Mr. BROWN would immediately commence the process of seeking a competent criminal attorney and, after consulting with this individual, would recontact the FBI in order to set up another meeting.

SC 183-94

On July 12, 1977, SAs JOHN F. MULLIGAN, DON E. TRAUGHTER, and NORBERT R. LINKER, Los Angeles Division, met with attorneys representing DONALD KENT BROWN [redacted] and [redacted] in the office of [redacted] Sacramento.

The Agents attending this meeting expected to conduct an interview with DONALD KENT BROWN. It became obvious when the Agents arrived at the office of attorney [redacted] that he did not wish to have his client interviewed by the FBI, and [redacted] wanted to determine the specific allegations against his client.

[redacted] was advised the Agents could not furnish this information, and that the investigation was being held in abeyance in the hope of obtaining the cooperation of his client. [redacted] also was interested in determining if his client might be offered immunity for his testimony regarding political corruption. [redacted] was told that no promises could be made regarding immunity, and it was felt that Assistant U. S. Attorney (AUSA) THOMAS T. COURIS had no intention of offering BROWN immunity. [redacted] expressed a desire to speak with AUSA COURIS, and the Agents advised [redacted] they would proceed directly to AUSA COURIS' office and he would contact [redacted] telephonically by 4:00 PM. b6 b7C

On July 12, 1977, the Agents spoke with AUSA COURIS in his office, at which time COURIS advised he did not want to make any offer of immunity to BROWN at this time. COURIS then telephonically contacted attorney [redacted] and told him that there would be no offer of immunity to BROWN at this time; however, the FBI was still desirous of speaking with BROWN, and the investigation in this matter would proceed.

INTERVIEW OF JEFFERSON PEYSER

FEDERAL BUREAU OF INVESTIGATION

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9/16/77

Date of transcription

JEFFERSON PEYSER, attorney at law, 220 Bush Street, San Francisco, California, was advised that the interviewing Agents wished to speak to him regarding political corruption in the state of California. PEYSER was furnished an advice of rights form at which time he read it and indicated he did not wish to sign this form. PEYSER stated he declined to sign the form because he did not want to agree that any statements he might make could be used against him in the future. PEYSER then advised that he would agree to speak with the interviewing Agents; however, he requested that his secretary be present during the interview.

PEYSER related that he has been a lobbyist in the state of California since the 1950's and has continued his practice of law in San Francisco during those years also. He stated that he has represented the Wine Institute for over 20 years as a lobbyist in Sacramento, California, and he has also represented the Independent Mortgage Brokers (IMB) who are also known as the Mortgage Brokers Institute (MBI) since the 1950's. PEYSER advised while he was representing the MBI, he had dealings with BENJAMIN ZIMMERMAN, who is a Mortgage Broker from Southern California. He also advised that a great deal of his work involving the MBI was handled by his associate, MAX R. KAHN. PEYSER went on to advise that KAHN died in February, 1977.

PEYSER was then asked what type of legislation he lobbied for which related to the MBI. He stated that he did not recall how many bills he introduced into the legislature for MBI; however, during the 1950's and 1960's he advised there were no more than three bills introduced which would allow higher fees payable to the Mortgage Brokers for their work. He stated that before a bill would be introduced, he would contact the Real Estate Commissioners Office to determine if that office would look favorably upon a piece of legislation involving the Mortgage Brokers. If the MBI decided they wished to introduce the bill and the Real Estate Commissioners Office advised they would not attempt to have the bill killed, he would then go ahead and

Interviewed on 9/8/77 at San Francisco, California File # SC 183-94

SAs JOHN F. MULLIGAN &
by THOMAS P. GRIFFIN JFM:aly 60 Date dictated 9/14/77
Ronald Reagan-4436

introduce a bill through a friendly Assemblyman and then take his chances in the legislature.

PEYSER further advised that before a bill would be introduced in favor of MBI, he requested that MBI prepare data to indicate how much money it cost them and how much money each transaction would cost and, thereby, point out that there was very little profit involved on each transaction. PEYSER further advised that on two occasions, bills were introduced into the legislature even though the Real Estate Commissioners Office in the state of California had previously advised that they would not look favorably upon this legislation. He advised that he would introduce these bills at the urging of MBI even though he felt that without the Real Estate Commissioner's approval the bill would never be written into law.

PEYSER's recollection of bills which he lobbied in favor of MBI was very vague; however, he did indicate he introduced a bill for them in 1973, which dealt with prepayment penalties. PEYSER indicated that he did not recall the specifics of the bill; however, he did recall that the bill was not passed.

PEYSER was then asked if during the early 1970's he had ever offered a bribe to obtain votes in the State Legislature in favor of a bill which would influence MBI or a California Independent Mortgage Association. PEYSER advised that he never made a bribe offer and had no recollection of any bribe offers ever being made to influence legislation regarding Mortgage Brokers. PEYSER also advised that he was not aware of any individual connected with MBI ever making a bribe offer or even feeling him out to determine if a particular Legislator would look favorably upon a bribe offer. PEYSER also advised that he was never solicited for a bribe by an elected official in the state of California. At this point, PEYSER began a discussion regarding his background and the fact that he has served as a lobbyist for over 20 years and has received recognition from several elected officials in the state of California for being an honest lobbyist. PEYSER also indicated his anger at members of the media and stated, "The media is responsible for the odor on people in public life."

At the conclusion of the interview, PEYSER indicated that his recollection regarding Mortgage Brokers Institute was very vague and that he terminated his relationship with MBI in 1973. He further advised that during the early 1970's, he traveled extensively throughout the United States and also in Europe. PEYSER indicated that he would furnish the Agents with the dates of his travel outside the state of California and at that time requested that his secretary make up such a list. PEYSER also mentioned that [REDACTED] was also an associate of his and handled much of his lobbying activity which related to the Wine Institute. PEYSER also wanted to know whether the Agents would recontact him regarding this investigation. The Agents advised that the information received from him and other individuals during this investigation would be turned over to the United States Attorney, at which time it would be determined whether or not a Grand Jury proceeding would be convened to continue this investigation.

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SC 183-94

INVESTIGATION AND INTERVIEWS OF CLIENTS AND
FORMER CLIENTS OF DONALD KENT BROWN AND
JEFFERSON PEYSER

FEDERAL BUREAU OF INVESTIGATION

1

8/4/77

Date of transcription

Chemical, [redacted] Dow
California, phone [redacted] furnished the following
information:

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[redacted] advised that he was the individual in Dow responsible for the proposed construction of the new Petro Chemical Plant to be built in Contra Costa and Solano County. [redacted] advised that he had employed lobbyists [redacted] and [redacted], who had done general lobbying work for Dow Chemical. [redacted] advised that his company encountered a great deal of difficulty in securing state approval for construction of the Petro Chemical Plant. [redacted] said he spoke with [redacted], who is an attorney representing Dow Chemical in the bay area. [redacted] mentioned to him that Sohio Transportation Company had hired lobbyist DONALD KENT BROWN and BROWN seemed to be doing a good job for them. [redacted] arranged to meet with BROWN and told BROWN he needed someone to open doors for him in the Governor's Office and obtain a decision from the State of California regarding the proposed plant within four months. BROWN said he would see what he could do and get back to [redacted] with his decision. Two weeks later in late August, 1977, BROWN told [redacted] he could get a decision from the state within four months and BROWN's friendship with [redacted] State of California would be invaluable in bringing this matter to the attention of the Governor. BROWN requested and received a salary of \$4,500 a month for four months.

[redacted] further elaborated on additional problems encountered in dealing with the Governmental officials in Sacramento and advised finally on January 15, 1977, the Board of Directors of Dow Chemical voted to discontinue efforts to build a Petro Chemical Plant in California.

When this decision was made, the services of D. K. BROWN were no longer needed and the business relationship was ended. [redacted] stated that in April, 1977 the State of California began what appeared to be a smear campaign

Investigation on 8/2/77 at Sacramento, California File # SC 183-94
by SA THOMAS P. GRIFFIN and
SA JOHN F. MULLIGAN JFM:mm1 64. Date dictated 8/3/77
Ronald Reagan-4440

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SC 183-94

against Dow and at that time D. K. BROWN was rehired at \$2,000 a month to combat this smear campaign. [] advised that his company made no political contributions through Lobbyist D. K. BROWN. He said that BROWN is still retained by Dow and he plans to continue this relationship until the end of the year.

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b7C

[] further that in January, 1977, BROWN called him and stated that [] had decided to quit his job as [] and go into private practice. BROWN wanted [] to meet with [], which he did and [] brought with him a proposal to work for Dow on a retainer of \$3,000 a month. [] proposed to continue his efforts at having State of California and Governor BROWN approve construction of the Dow Chemical Plant. [] stated that since leaving his position with the state, he had continued to work toward that end even though he was not on retainer with Dow at the time. It was shortly after this meeting that Dow withdrew their plans to build a plant in California, however, [] stated Dow Chemical paid \$3,000 to [] for his assistance which he said he gave after leaving his position with the state.

[] was asked if any honoraria were paid by Dow Chemical through lobbyist D. K. BROWN. [] stated that a \$300.00 honorarium was paid to State Senator BILL CAMPBELL for a speech he made on March 15, 1977 to professional employees of Dow Chemical in Sacramento. He also said that another \$300.00 honorarium was paid to State Senator BILL CAMPBELL for a speech he made in Sacramento on May 25, 1977 to the Walnut Creek Chamber of Commerce.

[] also advised that he had noticed some professional jealousy between lobbyist [] and D. K. BROWN. However, he felt it was a problem brought on by himself by not handling a lobbyist correctly and giving them specific sphere of influence to work on. [] also stated that BROWN had mentioned to him that he could be helpful to Dow Chemical in the states of Washington, Oregon, Arizona, and especially Nevada. BROWN stated that he could provide assistance in any anticipated contacts with the governors in these states. [] indicated that Dow had no pressing business with these states and did not call on BROWN to assist Dow with business in these states.

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SC 183-79
SC 183-94
JFM/ab

The following investigation was conducted by
Special Agents JOHN F. MULLIGAN and NORBERT R. LINKER on
August 17, 1977:

AT SIMI VALLEY, CALIFORNIA

Investigation conducted at 4072 Township Avenue,
revealed that NADINE HENLEY no longer resided at this
address and the house was for sale. Investigation at the
U. S. Post Office, Simi Valley, revealed that forwarding
address for HUDSON MARSHALL, husband of NADINE HENLEY, is
Regency Towers, 15-D, 3111 Belair Drive, Las Vegas, Nevada.
Also listed as a forwarding address for NADINE HENLEY was
18060 Boris Drive, Encino, California.

AT ENCINO, CALIFORNIA

On August 17, 1977, investigation conducted at
18060 Boris Drive reveals that the residents at this
address were renting the house from NADINE HENLEY and they
advised that HENLEY is currently residing in Las Vegas,
Nevada.

Ronald Reagan-4442

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 8/22/77

JOHN P. SYKES, President, Ames Home Loan Company, 4311 Wilshire Boulevard, Los Angeles, California, telephone number 937-2727, was advised by the interviewing Agents that an investigation is being conducted by the FBI regarding political corruption. SYKES was also advised that the Agents wished to speak with him regarding his association with the California Independent Mortgage Brokers Association (CIMBA).

SYKES advised that he is the Vice President of CIMBA and is a charter member of CIMBA, which began in 1973. This organization grew out of an organization known as the Mortgage Brokers Institute (MBI). SYKES advised that a schism developed among the members of the MBI in 1973, at which time he and several other mortgage brokers split with MBI to form CIMBA. He stated he had never been very active in MBI, however, he was a regular dues-paying member.

After the formation of CIMBA, they hired Lobbyist JEFFERSON PEYSER, who represented them in Sacramento, for a short period of time. SYKES further advised that PEYSER was also the lobbyist for MBI and had been closely associated with BENJAMIN ZIMMERMAN, the former President of MBI. He said that ZIMMERMAN was getting up in years and he was not asked to join CIMBA as there was a personality conflict between ZIMMERMAN and members of CIMBA. SYKES further advised that PEYSER was in his 70's and CIMBA retained a younger lobbyist by the name of D. K. BROWN, at which time the services of PEYSER were discontinued.

SYKES stated that D. K. BROWN has been representing CIMBA since 1974 and he was responsible for finding Assemblyman PAPAN, who in 1976, authored Assembly Bill 2159, which was passed, granting additional fees and higher allowable interest rates for mortgage brokers. He also said that he doesn't think anyone would offer bribes to elected officials on behalf of CIMBA, especially a lobbyist, because CIMBA would not authorize its lobbyists to make an offer of a bribe. SYKES stated that CIMBA is very conscientious in complying with provisions of Proposition 9, also known as the Political Reform Act of 1974.

Investigation on 8/16/77 at Los Angeles, California File # SC 183-94 -23
by SAs NORBERT R. LINKER & JOHN F. MULVIGAN/mlr 67 Date dictated 8/22/77
Ronald Reagan-4443

SYKES stated that CIMBA has retained Attorney CHIP NIELSEN for the purpose of reviewing contribution statements which are sent to the California Secretary of State's Office and the Fair Political Practices Commission in compliance with Proposition 9.

SYKES further advised that most of the contributions made by CIMBA are in reply to invitations to fund-raising affairs. SYKES said he has no knowledge of any Legislator ever suggesting a contribution be made or else he would not vote favorably for Bills sponsored by CIMBA. SYKES added that one Legislator could not hurt CIMBA, and therefore, would not have the power to extort funds from CIMBA.

SYKES recalled that BENJAMIN ZIMMERMAN, the former President of MBI, was always attempting to raise funds for political contributions. ZIMMERMAN was not always successful, however, he needed these funds to cover the expenses of their lobbyist, JEFFERSON PEYSER, and also to make the political contributions recommended by PEYSER. SYKES added that PEYSER was very familiar with the older members of the Legislature, which included people like former State Senator RANDY COLLIER. SYKES reiterated that this was one of the reasons why CIMBA decided to retain Lobbyist DONALD KENT BROWN.

At this time, SYKES was advised of his rights, at which time he read and signed an "Advice of Rights" form. SYKES was then asked if he ever authorized anyone to make a bribe offer to an elected official on behalf of CIMBA. SYKES replied in the negative. SYKES also advised he did not know of any bribe offer being made by either JEFFERSON PEYSER or DONALD KENT BROWN. He also stated that he never heard of an elected official ever soliciting monies in a subtle form of extortion from any members of CIMBA. SYKES further advised that D. K. BROWN never indicated to him that he ever offered any monies to elected officials.

SYKES was asked if he knew why five, \$1,000 checks were drawn on the CIMBA account, payable to friends of LOU PAPAN in October, 1976. SYKES replied he did not know why these checks were drawn in that manner. SYKES was also asked if any individuals legislator ever introduced a Bill which would endanger the mortgage brokerage industry and if this legislator would then solicit funds to drop such a Bill. SYKES replied that no legislator ever solicited funds to drop a Bill, however, several Bills have been introduced that opposed the position taken by CIMBA. He stated that the legislators who introduced such Bills are dedicated and professional law makers.

SC 183-94

At the conclusion of the interview, SYKES was asked how much financial gain would be realized by the industry through the passage of Assembly Bill 2159 in 1976. He stated that this Bill would increase a profit on every loan made by mortgage brokers at least by \$35. SYKES advised that Union Mortgage Company is the largest mortgage brokerage firm in California and his company, Ames Home Loan Company, is the second largest firm in California.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 8/22/77

JOSEPH A. SEEDMAN, President Union Mortgage Company, 2641 West Olympic Boulevard, Los Angeles, 386-7383, was advised that the interviewing agents were conducting an investigation of political corruption, which involves the offering of bribes to elected officials in the State of California. SEEDMAN was then asked to explain his association with the organization known as the California Independent Mortgage Brokers Association (CIMBA).

SEEDMAN advised that he and six other mortgage brokers formed CIMBA in late 1973 because they felt a need for active representatives in the State Capitol. SEEDMAN stated that he and the other six individuals had belonged to the organization known as the Mortgage Brokers Institute (MBI). He stated that MBI was a social organization and at times became involved in activities in the State Capitol. He stated that MBI would react to adverse legislation, however, they did not attempt to initiate action at the State level. SEEDMAN advised that MBI had employed a lobbyist by the name of JEFFERSON PEYSER and PEYSER also represented CIMBA in its early stages.

SEEDMAN added that the mortgage brokers wanted to improve their image throughout the State and felt a need to retain an active lobbyist in Sacramento who would work year round in their interest. He stated that JEFFERSON PEYSER worked for CIMBA in late 1973 and it was felt that PEYSER was too old to handle the work that CIMBA wanted at the time. He stated that Lobbyist DONALD KENT BROWN was hired because he was a younger man and had a good reputation as an aggressive lobbyist.

At this time during the interview, SEEDMAN was furnished an "Interrogation; Advice of Rights" form, which he read and stated he understood his rights. He was then told that the FBI has received allegations that bribe offers have been made in an effort to influence legislation relative to the MBI. SEEDMAN advised that he was not aware of any bribes being offered to elected officials and knew of no

Investigation on 8/16/77 at Los Angeles, California File # SC 183-94 -22
by SA NORBERT R. LINKER & SA JOHN F. MULLIGAN/kmc 70 Date dictated 8/19/77
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bribe offers being made by any lobbyist or advocates of CIMBA. He also advised that no monies were ever offered by JEFFERSON PEYSER or DONALD KENT BROWN in the form of bribes to influence legislation for CIMBA or MBI.

SEEDMAN then explained that all political contributions made by CIMBA are made by check and records are maintained in his office by his secretary, JENNY WILLIAMS. He stated that the average contribution made by CIMBA is between \$50 and \$200 and he would consider \$1,000 a substantial contribution. He further stated he never made any cash available to lobbyists JEFFERSON PEYSER or DONALD KENT BROWN.

SEEDMAN further advised that to his knowledge neither he nor any members of CIMBA have been approached personally for contributions by legislators except through invitations to luncheons and other fund raising gatherings. He also stated neither he nor any member of CIMBA has been approached by legislators who introduced bills unfavorable to the industry with the understanding that the bills would not be introduced if a contribution or bribe was paid. He stated that whenever CIMBA supported legislation, they were always prepared to present factual arguments in favor of the bills they supported. SEEDMAN stated in 1976 assembly bill number 2159 authored by Assemblyman LOU PAPAN was proposed, which increased the allowable interest rate on a second mortgage loan. He stated that these rates had not been increased for several years and an increase was necessary to keep pace with inflation. He stated that most bills involving mortgage brokers would be handled by the Financing and Insurance Committee of the Assembly and Senate. SEEDMAN stated that he has no personal relationship with members of these committees nor with any members of the California State Legislature.

SEEDMAN went on to explain that Assemblyman LOU PAPAN was an insurance man and was involved in real estate before going to the Assembly. He stated because of PAPAN's background, PAPAN understood the proposals involved in the business community and he agreed to sponsor this legislation for CIMBA. SEEDMAN stated PAPAN was able to argue in favor of the bill because of his background and he was responsible for seeing the bill through the Assembly and the Senate.

Ronald Reagan-4447

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SEEDMAN then began discussing BENJAMIN ZIMMERMAN who was a former president of MBI. He stated that ZIMMERMAN is an ethical man, however, he comes from the old school. SEEDMAN explained that a member of the old school would be defined as a person who would say "If you drop something on the floor, you'd better pick it up and also the tile underneath". He stated that ZIMMERMAN runs a very tight ship in his business operation and he might have knowledge of the activities of lobbyists who worked for MBI, especially before the formation of CIMBA.

SEEDMAN was then asked if he had ever heard of the sum of \$100,000 being offered by a representative of CIMBA to an elected official for favorable action on a piece of legislation involving mortgage brokers. SEEDMAN stated he has never heard of any offer of monies, especially \$100,000. He stated that it is difficult to get members of CIMBA to raise their dues to make the legitimate contributions that they make at this time, and he doubted that anyone would take it on themselves to offer \$100,000 to an elected official.

SEEDMAN was then furnished a copy of a 1973 Senate Bill Number 304 and 310, sponsored by Senator WHETMORE. He stated that these bills involved regulations in the Mortgage Brokers Industry and he and CIMBA would favor these bills because there have been no regulations regarding mortgage brokers passed into law since 1955. SEEDMAN stated he thought these regulations were necessary and would contribute to the uniformity and professionalism of mortgage brokers.

SEEDMAN was then furnished a copy of Senate Bill number 1339 authored by Senator BEILENSON in 1972. He stated he was unfamiliar with this bill.

SEEDMAN stated that most contributions made by CIMBA are made after the receipt of a letter from an elected official requesting them to purchase tickets to a fund raising gathering. He offered that CIMBA had a check returned once and it was returned by JERRY BROWN when he was running for Governor. SEEDMAN added that when he was represented by Judge GARIBALDI and by CHIP NELSON, JR. He stated that NEILSON is primarily involved with the preparation of contributors reporting to the California Secretary of State's Office. SEEDMAN concluded by adding, that the interviewing agents could speak with his secretary.

Ronald Reagan-4448

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 8/19/77

GENEVIEVE (JENNY) WILLIAMS, Secretary to J. A. SEEDMAN, President, Union Mortgage Company, 2641 West Olympic Boulevard, Los Angeles, telephone 386-7383, furnished the following information:

WILLIAMS advised she has been employed by Mr. SEEDMAN for 10 1/2 years and in her capacity as Mr. SEEDMAN's secretary, she also has responsibility for handling the books and paperwork for the California Independent Mortgage Brokers Association (CIMBA). WILLIAMS stated that her work with CIMBA involves sending dues reminders to the 58 members and paying monthly bills which include attorney fees, fees to Lobbyist DONALD KENT BROWN, and expenses incurred by D. K. BROWN.

WILLIAMS further advised that she handles all checks drawn on the CIMBA account, which is under the name California Real Property Loan Brokers Association, account number 659005352, at Crocker National Bank, 1625 West Olympic Boulevard, Los Angeles. WILLIAMS said that CIMBA receives several invitations to fund raising parties and dinners and these invitations are passed on to Mr. SEEDMAN. She believes that Mr. SEEDMAN would then decide whether or not to send a contribution in reply to this invitation or possibly he would discuss the possible contribution with other members of CIMBA. She further advised that when Mr. SEEDMAN approves a contribution he authorizes her to write a check and prepare an envelope addressed to the appropriate campaign fund and/or elected official. After preparing the check and envelope, it is then forwarded to GARY JUDAS, President of Capitol Home Loans, who would then co-sign the check and mail a contribution.

WILLIAMS further advised that she does not have specific knowledge regarding how it is decided to make campaign contributions. She was asked why in October, 1976, five \$1,000 checks were made to the Friends of LOU PAPAN. She stated that these five checks were drawn in lieu of one \$5,000 contribution check because the checking account did not have sufficient balance to cover one \$5,000 contribution.

Investigation on 8/17/77 at Los Angeles, California File # SC 183-94-19
by SA NORBERT R. LINKER & SA JOHN F. MULLIGAN JFM/ab 73 Date dictated 8/19/77
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She further advised that all five of these checks were subsequently voided and two checks were drawn on November 5, 1976, payable to Friends of LOU PAPAN in the amounts of \$3,000 and \$2,000. WILLIAMS stated this contribution would be considered large compared with other contributions made by CIMBA, which range from \$50 to \$350 generally. She stated that she does not know how it was decided to make such a large contribution to Assemblyman PAPAN, however, she said they were handled in accordance with previous contributions and the checks were co-signed by Mr. JUDAS.

WILLIAMS was asked if contribution checks were ever forwarded to the office of DONALD KENT BROWN. She replied that all contribution checks that she prepares are prepared with an envelope addressed to the campaign committee and/or the specified elected official. WILLIAMS also stated that to her knowledge no contribution checks were ever handcarried to Sacramento by any member of CIMBA. WILLIAMS was also asked if she knew Lobbyist JEFFERSON PEYSER, to which she replied in the negative.

At the conclusion of the interview WILLIAMS stated that she does not recall Lobbyist D. K. BROWN ever making recommendations for contributions to elected officials and she would state that the \$5,000 contribution to Assemblyman PAPAN is the largest single contribution she could recall ever being made by CIMBA.

FEDERAL BUREAU OF INVESTIGATION

8/23/77

Date of transcription

BENJAMIN J. ZIMMERMAN, President, Mortgage Mart, Inc., 9911 West Pico Boulevard, Suite 15, Los Angeles, California, telephone 553-4857, was advised that the interviewing agents wished to speak to him regarding political corruption at the state level. ZIMMERMAN was also advised that the interviewing agents wanted to obtain information regarding his activities with reference to the Mortgage Brokers Institute (MBI) and other activities relating to the mortgage brokerage industry.

ZIMMERMAN stated MBI was organized in 1951 as a social organization made up of individuals involved in the trade. He stated in the early years, MBI had very little to do with trying to influence legislation relating to mortgage brokers. In 1955, ZIMMERMAN stated there had been an expose' regarding the mortgage brokerage industry, and this spurred legislators in Sacramento to introduce legislation relating to mortgage brokers. ZIMMERMAN worked with Mr. CONSER of the California Real Estate Association in attempting to see that any legislation passed would be favorable to the Real Estate Association and also MBI. ZIMMERMAN advised MBI retained JEFFERSON PEYSER as their registered lobbyist from 1954 through 1973. He also said that if the agents desired detailed information regarding the activities of MBI, they should contact CLIVE HUFFMAN of Clive Huffman Associates, 8383 Wilshire Boulevard, Suite 520, Beverly Hills, California. HUFFMAN was the executive secretary for MBI for several years.

ZIMMERMAN said MBI is still in existence at this time and his son, STANLEY ZIMMERMAN, is an officer in the organization. He added, however, that MBI no longer retains a lobbyist.

ZIMMERMAN further advised MBI was made up of about 20 members prior to the formation of the California Independent Mortgage Brokers Association (CIMBA) in 1973. He stated CIMBA retained lobbyist JEFFERSON PEYSER for a short period of time in 1973 and then retained another lobbyist in 1974. ZIMMERMAN advised he was not familiar with lobbyist DONALD KENT BROWN who is presently the retained lobbyist for CIMBA.

Investigation on 8/17/77 at Los Angeles, California File # SC 183-94-20
by SA JOHN F. MULLIGAN and
SA NORBERT R. LINKER JFM:smd 75 Date dictated 8/19/77
Ronald Reagan-4451

At this time in the interview, ZIMMERMAN was advised that the agents would like to ask him specific questions regarding the offering of bribes to elected officials in the State of California. ZIMMERMAN was furnished an Advice of Rights form which he read and stated, "You're getting serious now." ZIMMERMAN refused to sign the Advice of Rights form; however, he indicated he understood his rights and did not wish to terminate the interview.

ZIMMERMAN was then asked if he was aware of any monies being offered to elected officials by JEFFERSON PEYSER in behalf of MBI, to which ZIMMERMAN replied in the negative. ZIMMERMAN then began to talk about PEYSER's friends in state government. He stated PEYSER had known former Governor PAT BROWN when BROWN was Secretary of State, and PEYSER was also very close to JESSIE UNRUH during the time UNRUH was Speaker of the California Assembly. He said PEYSER had a good reputation as a lobbyist and PAT BROWN once told him that PEYSER was able to get things done and could work well under pressure.

ZIMMERMAN also advised he was not aware of any solicitation made by elected officials for money from PEYSER or from any members of MBI. He stated PEYSER did recommend to MBI to whom political contributions should be made in the State Legislature. ZIMMERMAN indicated PEYSER made these recommendations during the early years of their association when he and other members of MBI were not aware of the legislators who would look favorably on the mortgage brokerage industry.

ZIMMERMAN further advised PEYSER told him that the best way to influence legislation in Sacramento was to have facts supporting your arguments, and PEYSER even requested that outside consultants be hired to make studies for the mortgage brokers. He stated these studies would then be used as objective evidence to support the arguments made by the mortgage brokers. PEYSER never indicated to ZIMMERMAN that any legislator in Sacramento could be bought. ZIMMERMAN stated PEYSER was a very effective lobbyist for MBI because PEYSER had many contacts in Sacramento and was well-known to

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several of the legislators. He added PEYSER also had an associate by the name of MAX KAHN who handled the administrative matters of the office, and to his knowledge, KAHN did not actively participate in the lobbying efforts of PEYSER.

ZIMMERMAN was then furnished copies of 1973 Senate Bills (SB) 304 and 310 which were introduced by State Senator WHETMORE. ZIMMERMAN indicated he would rather these bills had never been enacted into law because they set regulations on interest rates and also on the ceiling for unregulated loans. ZIMMERMAN said he was not aware of any lobbying done in connection with this legislation. ZIMMERMAN also advised he was not familiar with WHETMORE. At this point, ZIMMERMAN pointed out that in 1976, Assembly Bill (AB) 2159 authored by Assemblyman LOU PAPAN was the first piece of legislation passed which increased interest rates for mortgage brokers since 1955. He added he was not involved in lobbying for AB 2159 because MBI no longer had a lobbyist and CIMBA had a lobbyist in Sacramento who was fighting for this bill.

ZIMMERMAN was then asked what type of work was being done by PEYSER during the period that he represented MBI. ZIMMERMAN stated PEYSER would contact members of the Legislature to determine if a bill favorable to the mortgage brokers would be passed if it were introduced. He added PEYSER would first check with the Real Estate Commissioner because any legislation involving the mortgage brokers would first have to have approval of the State Real Estate Commissioner. ZIMMERMAN was then asked if the Real Estate Commissioner ever approved of the introduction of legislation favorable to the mortgage brokers. He stated in the early 1970s, PEYSER had received indication that a bill might be passed favorable to the mortgage brokers. ZIMMERMAN stated he believes a bill was introduced at that time; however, it did not pass through the Assembly. ZIMMERMAN did not recall the date this bill was introduced nor the individual who authored this bill.

FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 9/14/77

GARY W. GRANT, Executive Director, California Housing Council, Inc. (CHC), 1777 Borel Place, San Mateo, California, was interviewed at the FBI Office in San Francisco, California. GRANT was advised that the Agents wished to speak to him regarding political corruption, at which time GRANT was advised of his rights and he read and signed an Advice of Rights form.

GRANT advised that the CHC was formed in late 1975 through a coalition of apartment owners from Southern and Northern California. He stated that HOWARD RUBY was an organizer of apartment owners and rental property owners in Southern California, and GERSON BAKER, BERT AVERY, PRESTON BUTCHER (phonetic), and BOB MC NEIL, were also active in forming the CHC. He said CHC was formed in response to rent control initiatives in Palo Alto and Berkeley, California.

GRANT advised that he began employment with CHC in April, 1976, at the same time as TED DIENSTFREY. GRANT advised that JOE CERRELL, who is a public relations man in Southern California, and DONALD BROWN, who is a lobbyist in Sacramento, were hired by CHC in late 1975. GRANT believed that BOB MC NEIL of Pacific Plan may have been instrumental in the hiring of DONALD BROWN. GRANT explained that BROWN represents the California Independent Mortgage Brokers and MC NEIL is also a member of that organization. GRANT added that CERRELL had acted as an administrator for CHC in the early stages, however, he was told that CERRELL was not capable of handling the CHC affairs. CERRELL's function at the time GRANT was hired was to obtain support from the media, especially the newspapers, throughout the state and from organized labor for passage of the Rent Control Pre-emption Bill in the California Legislature. GRANT further advised that he was employed by Joseph Samson, Inc., who is a member of CHC, and SAMSON recommended him for the position of Executive Director of CHC.

GRANT further advised that at the time he began working with CHC, Assembly Bill (AB) 3788 was introduced in the Legislature by Assemblyman BILL CAMPBELL and this

Interviewed on 9/8/77 at San Francisco, California File # SC 183-94

by SA's THOMAS P. GRIFFIN & JOHN F. MULLIGAN JFM/ab Date dictated 9/13/77

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bill was a Rent Control Pre-emption Bill. GRANT stated that Assemblyman CAMPBELL and DONALD BROWN are associated with each other, however, he does not know the extent of the relationship. GRANT advised that CHC was attempting to obtain a coalition in favor of the Rent Control Pre-emption Bill and they were trying to obtain support from the NAACP, Sierra Club, and other environmentalist groups. GRANT stated he was very much involved in these activities by seeing that monies were collected from members to back AB 3788 and was working with JOE CERRELL to supply witnesses for the hearings held in Sacramento regarding AB 3788. GRANT further advised that CHC did endorse other bills. For example, CHC endorsed a bill calling for subsidy for elderly renters, however, he stated AB 3788 was their most important bill in the Legislature.

GRANT was then asked to explain the process CHC used in making political contributions. He advised that his office would receive notices in the mail announcing a fund raiser or a birthday party was to be held in honor of a specific legislator. He would then contact JOE CERRELL and DONALD BROWN and obtain their opinion of the legislator and come to a conclusion as to whether a contribution would be in order. He would then recommend that these contributions be made to the Legislative Committee of the CHC which met after the General Board meeting of CHC. GRANT did not recall specifically the names of all the members of the Legislative Committee, however, he did state that BOB MC NEIL and LARRY KATES were consulted regarding contributions and they were members of the Legislative Committee. After their approval, GRANT would then request his administrative assistant, MARGARET HASSET, to write out the contribution check which would then be signed by GRANT and one of the members of CHC in the northern peninsula area. He stated that most often the second signature on the check would be BOB MC NEIL, PRESTON BUTCHER, JOSEPH SAMSON, BERT AVERY, or GERSON BAKER. MARGARET HASSET would then give the checks to TED DIENSTFREY or send them to JOE CERRELL for delivery. He stated that the checks would be hand delivered by CERRELL or DIENSTFREY as this was the method agreed on for delivering the checks.

GRANT advised that this account used for political contributions is entitled CHC Political Action Committee, and the account is at the Bank of America, Market Street

Branch, San Francisco, California. CHC also maintains a second account at the Bank of America which is a general account not used for political purposes. GRANT stated that funds for the Political Action Committee account are raised through dues collected from members of CHC. He stated that one-third of dues collected went to the Political Action Committee account and the other two-thirds would go in the general account. Each member of CHC is assessed \$2.50 for each rental unit owned and the accounts are separate because the general account is tax deductible and the monies contributed to the Political Action Committee account is not tax deductible.

GRANT further advised that attorney CHIP NIELSEN is retained by CHC and NIELSEN insures that CHC conforms with the regulations regarding campaign contributions as set out in the Political Reform Act of 1974. GRANT advised that to his knowledge no campaign contribution from CHC was ever forwarded to the office of DONALD KENT BROWN for delivery. He stated he did not know of any gifts or transportation supplied to Assemblyman PETER CHACON, Chairman of the Assembly Community Development and Housing Committee. He also advised that he is not aware of any business relationship between any member of the California Legislature and any member of CHC. He stated that he does not know of any transportation supplied by BROWN to any member of the Legislature.

GRANT added that after AB 3788 was vetoed by the government, it was decided by CHC that JOE CERRELL had been ineffective in obtaining the support of organized labor and therefore his services were terminated. CERRELL had also been mistaken in reporting that an editorial would be forthcoming in favor of CHC position on rent control when in fact the editorial came out opposed to AB 3788. He stated that in the early stages of CHC, members of CHC would attend fund raising dinners on the recommendation of JOE CERRELL and DONALD BROWN, however, this is not done on a regular basis anymore. GRANT advised that after invitations were received to fund raisers, usually a staff member of the Legislature would contact CHC to determine if they intended to contribute and if they intended to attend. He stated, however, that he is not aware of any solicitations of funds from Legislators which could be construed as bribes or offers to sell votes.

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GRANT added that DON BURNS, former California Secretary of Business and Transportation, had supported AB 3788 in the Executive Branch, however, BURNS never received any funds from CHC either before or after his termination as Secretary of Business and Transportation.

At the conclusion of the interview GRANT advised that AB 933, authored by Assemblyman LOU PAPAN, was introduced in the 1977 session of the Legislature, however, no effort is being made to have the bill passed because they do not wish to risk another veto. GRANT advised that PAPAN came forward and offered to introduce the Rent Control Pre-emption Bill for CHC and it was felt that PAPAN would be a good sponsor for the bill. PAPAN is known to have support of labor in the bay area and he is also closely associated with Assembly Speaker LEO MC CARTHY.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 9/14/77

TED DIENSTFREY, Director, Research and Planning, California Housing Counsel, Inc., (CHC), 1777 Borel Place, San Mateo, California, was interviewed at the FBI Office in San Francisco. DIENSTFREY was advised of his rights, at which time he read and signed an "Interrogation; Advice of Rights" form.

DIENSTFREY stated he began working with CHC in April, 1976. He advised that the CHC began in the Fall of 1975 as an organization of rental property owners who were united to protect their interests. He stated that the problem CHC has fought since its inception has been the problem of rent control. DIENSTFREY advised that CHC is a statewide organization and they hired a public relations man by the name of JOE CERRELL for the purpose of uniting organized labor and the media behind the rent control issue, in favor of CHC opposition to it. DIENSTFREY also advised that CHC employs lobbyist DONALD KENT BROWN to handle their lobbying in the State Capitol. He added he was not a personal friend of either CERRELL or BROWN, and both men were hired before he became associated with CHC.

DIENSTFREY further advised that GARY W. GRANT is the Executive Director of CHC and he also began his employment with CHC in April, 1976. GRANT, who is an attorney, had been working for JOE SAMSON, who is a member of CHC. DIENSTFREY also advised that CHIP NEILSEN is retained by CHC for the purpose of complying with the regulations of the California Political Reform Act of 1974.

DIENSTFREY then explained that in April, 1976, CHC was working on passing a rent control pre-emption bill, Assembly Bill Number 3788, authored by Assemblyman CAMPBELL. After joining California Housing, DIENSTFREY was asked to rewrite the bill in order to include all those points that CHC thought were important. The bill was rewritten and assigned to the Assembly Housing and Community Development Committee chaired by Assemblyman PETER R. CHACON. It was passed out of the committee and

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Interviewed on 9/7/77 at San Francisco, California File # SC 183-94

by SA THOMAS P. GRIFFIN & SA JOHN F. MULLIGAN/kmc 82 Date dictated 9/12/77

was approved by the Assembly. It then went to the Senate Judiciary Committee, which is chaired by Senator ALFRED H. SONG. DIENSTFREY was keeping abreast of the situation at the Capitol regarding the bill when he learned that the Committee vote on Assembly Bill 3788 was scheduled for consideration when the Republican convention was scheduled. He thought this to be poor timing because the Republicans on the Committee were in favor of the bill, however, they would be absent during the vote. He explained his concern to DONALD KENT BROWN and BROWN arranged the vote to be moved up one week. DIENSTFREY stated that the press gave them trouble about changing the date of the vote and said it was changed to keep the opponents of the bill from speaking against the bill. Nevertheless, the bill was voted out of the Committee and approved by the Senate and was forwarded to the Governor's Office for approval.

DIENSTFREY further advised that the bill received serious consideration from the Governor's Office, however, several incidents occurred which did not improve the atmosphere for the rent control pre-emption bill. He stated that the newspaper reported how much money was spent by CHC on political contributions to influence the bill and the bill also received opposition from JACK HENNING, a leader of the AFLCIO in California, who carries a great deal of weight. HENNING supposedly spoke to the Governor requesting the bill be vetoed.

DIENSTFREY further advised that JOE CERRELL was supposed to get organized labor to back the bill and as it turned out, JACK HENNING was one of the people most responsible for having the bill vetoed. For this reason, CERRELL was terminated by the CHC after losing the fight for passage of Assembly Bill 3788.

DIENSTFREY then advised that many political contributions were made during the campaign to pass Assembly Bill 3788. He stated that these contributions were made in response to solicitations for contributions that a fund raiser or a birthday party would be held for specific assemblymen and senators. DIENSTFREY stated that the decision to make contributions in response to these solicitations received in the mail was made by a committee in the CHC. After a contribution is approved, a check would be drawn

on the CHC Political Action Committee account payable to the fund raiser of the individual candidate. These checks were written by MARGARET HASSET, who works with GARY GRANT. The check would then be signed by GARY GRANT and one other director of CHC in the Bay Area. After the checks were signed, they would be given to GARY GRANT, JOE CERRELL, or himself for distribution to the individuals named on the checks. DIENSTFREY added that to his knowledge these checks were never forwarded to DONALD KENT BROWN for delivery. DIENSTFREY also indicated that he was not aware of any gifts being supplied to Assemblyman PETER CHACON by DONALD BROWN or any other person associated with CHC. He also advised that he was not aware of any business association between DONALD BROWN and CHC or between any member of the CHC and DONALD BROWN. He also indicated he was not aware of any business connections between any assemblymen or senators and any member of CHC. He also advised he was not aware of any free transportation being supplied by lobbyist DONALD BROWN to any elected official.

DIENSTFREY also advised that DONALD BROWN did arrange for he and GERSON BAKAR to meet with DON BURNS, the California Secretary of Business and Transportation. DIENSTFREY also advised that he and GERSON BAKAR talked with TONY KLINE and BILL PRESS, both of the Governor's Office, however, to his knowledge, BROWN did not arrange the meeting with KLINE or PRESS.

DIENSTFREY further advised that the CHC Political Action Committee account is maintained in the Bank of America, however, he was not sure of the branch. He stated that in most instances the second signature on checks written on that account would be one of the directors of CHC in the northern peninsula area. They are PRESTON BUTCHER, BURT AVERY, and JOE SAMSON.

DIENSTFREY was then asked if CHC would try again to pass a rent control pre-emption bill in 1977. He stated that Assemblyman PAPAN introduced Assembly Bill 933, which is a rent control pre-emption bill, however, the bill was never even given a hearing as

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they felt it would be a useless fight to pass the bill out of the Legislature and then for the Governor to veto it once again. He stated they are fighting the rent control issue on the local level and they will continue to work to gain the support of organized labor, which would help in passage of the bill.

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ASSOCIATES OF DONALD KENT BROWN

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 4/28/77

[redacted] voluntarily appeared at the FBI Office, Sacramento, California, and furnished the following information:

[redacted] currently resides at [redacted] California, telephone number [redacted] has been employed from [redacted] by Advocacion, Inc., and DONALD KENT BROWN. [redacted] advised that during her time of employment with BROWN, [redacted]

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[redacted] each time. [redacted]

[redacted] advised that [redacted] handled [redacted] for BROWN as well as acting as [redacted] and handling [redacted] stated that [redacted]

[redacted] It was questions like this that [redacted] feels [redacted]

[redacted] further advised that she supposed there was some type of deal being made which involved BROWN, [redacted], a member of the Board of Supervisors from Orange County, Hughes Air West and Summa Corporation. [redacted] said that Summa Corporation was going to make a contribution to [redacted] because [redacted] was to go along with a decision in favor of Hughes Air West. [redacted] did not know the details of the decision [redacted] was supposed to go along with, however, she thought it involved the purchase of helicopters. [redacted] stated that there are three people in Summa Corporation with whom BROWN has contact and they are JIM LA SAGE, NADINE HENLEY and JIM WADSWORTH. [redacted] stated that BROWN is reluctant to meet with people from Summa Corporation in Sacramento and prefers

Interviewed on 4/25/77 at Sacramento, California File # SC 183-79

by SAs RICHARD C. DONNER & JOHN F. MULLIGAN/mlr

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Date dictated 4/26/77

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to meet with them either in Los Angeles or Las Vegas. She added that BROWN spends a lot of time in Orange County.

[] explained that 90 percent of the clients that D. K. BROWN represents as a lobbyist seem to come to him through [] in the Los Angeles area. She stated that D. K. BROWN got the Sohio and the California Housing Council accounts through [] and BROWN would pay [] anywhere from \$1,000 to \$5,000 for getting him large accounts. [] stated that the California Housing Council last year was pushing Assembly Bill 3788, which was introduced by Assemblyman CAMPBELL. This Bill had to do with rent control by the State of California and the Housing Council wanted it passed. It did not pass in the 1976 Session and was reintroduced in the 1977 Session by Assemblyman PAPAN. [] stated that in connection with this Bill, the California Housing Council would make several contributions to Assemblymen and these contributions were sent by check to BROWN's office and then BROWN would hand deliver the individual checks to the Assemblyman that was supposed to receive them. [] stated that this practice is in violation with the law set out in Proposition 9 because a lobbyist is not supposed to directly furnish funds to any member of the Legislature. [] advised that D. K. prefers to hand deliver monies to members of the Legislature because he likes to say "I got this for you."

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[] further advised that BROWN has a partner named [] is a [] and has a reputation for having good rapport with the secretaries at the Capitol. He uses this friendship with the secretaries in order to obtain appointments with members of the Legislature. [] stated that [], from time to time, would arrange for a client to have a date with a secretary or a female employee at the Capitol, but she stated this does not happen on a regular basis. [] told [] on one occasion that he was told by []

that he should get away from D. K. BROWN. [redacted] did not clarify this statement, however, [redacted] believes that D. K. BROWN has a reputation for being a dishonest lobbyist and [redacted] was trying to give [redacted] some friendly advice in telling him to get away from BROWN. [redacted] stated that when D. K. BROWN asked [redacted] to work on the Bill regarding rent control that was being pushed by the California Housing Council, [redacted] told BROWN he would not work on the Bill if money was being contributed to Assemblymen on the committee that would be involved in passing the Bill. [redacted] stated that it does not seem right for such sizeable contributions to be made during a non-election year, especially to members of a committee which will pass on a Bill favorable to the Housing Council and then receive funds from the Housing Council.

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[redacted] additionally advised that BROWN is now involved in a land development deal [redacted] with [redacted]. This development is known as [redacted] and [redacted] is the person handling the development. [redacted] apparently owns the land being used for the development and D. K. BROWN, and possibly [redacted], are involved in obtaining funds for the development of the land. D. K. BROWN also pays for the air fare of [redacted] when he comes up from Los Angeles to work on the development. [redacted] advised that D. K. BROWN received in his office some legal papers involving this development which he was to sign, however, before signing, he checked with [redacted] advised him not to sign because he did not think it would be wise to show such a close relationship between BROWN and [redacted]. [redacted] also advised that BROWN would make recommendations to his clients in writing, regarding the amounts of contributions to be made to individual members of the Legislature. [redacted] had recently advised BROWN not to make these recommendations in writing anymore. [redacted] stated that D. K. BROWN has a PSA pass which entitles him to fly for free on PSA and the pass is in his name. BROWN is known to furnish this pass to members of the Legislature when they are flying on PSA. BROWN received this pass through [redacted].

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[] further advised that she feels BROWN is a dishonest man and lies very easily and she said that after he tells the same lie two or three times, he even believes it himself. BROWN also tells people that his wife is seriously ill, however, to the best of [] recollection, she does not remember when BROWN's wife was very seriously ill. She stated that BROWN and his family now reside at 8715 Curragh Downs, Fair Oaks, California 95628.

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 7/14/77

[redacted] Davis, telephone [redacted], furnished the following information:

[redacted] advised to the best of her recollection, the last bill lobbied by D. K. BROWN of interest to the California Independent Mortgage Brokers Association (CIMBA) was Assembly Bill (AB) 2159. [redacted] advised this bill was authored by Assemblyman LOU PAPAN and was passed during the 1976 session of the California State Legislature. [redacted] advised when this bill was being lobbied, her boss, D. K. BROWN, would maintain contact with JOHN SYKES and JOE SEEDMAN, who are employed by CIMBA.

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[redacted] further advised in the early months of 1977, BROWN requested that she prepare a list showing the contributions made by BROWN's clients to members of the State Legislature. [redacted] prepared this list by reviewing records submitted by the clients to BROWN regarding the specific amounts of contributions and to whom they were made. [redacted] furnished a copy of this list, which is entitled Contributions 1976. She said that BROWN wanted this list to use when he would meet with State Assembly Speaker LEO MC CARTHY. She advised that BROWN would display the list to MC CARTHY to show him what funds he was responsible for providing to the members of MC CARTHY's party.

[redacted] further advised in March, 1977, she recalled two incidents when checks from clients were received in BROWN's office and BROWN would later deliver these checks. These checks went to [redacted] could not recall what client furnished these checks. She also advised a check was received by BROWN from Dow Chemical Company which was intended for [redacted] To the best of [redacted] knowledge, this check was delivered by BROWN to [redacted]

[redacted] has never seen BROWN actually hand contribution checks to members of the State Legislature; however, she feels certain that he has hand-delivered these checks because she is aware of the fact they are delivered to the

Interviewed on 7/8/77 at Davis, California File # SC-183-94-11

by SA JOHN F. MULLIGAN:smd 91 Date dictated 7/12/77
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office and shortly afterwards, BROWN makes an appointment to meet personally with the Senator or Assemblyman for whom the checks are intended.

[] recalled that BROWN delivered checks to State Senators PAUL CARPENTER and WILLIAM CAMPBELL on behalf of his client, California Housing Council (CHC) during the time that AB 3788 relating to rent control was being considered by the Legislature. During the time that this bill was being considered, GARY GRANT and TED DIENSTFREY, both of CHC, were known to be passing out checks to members of the Assembly in the proximity of the Assembly chambers. [] advised it is illegal under the provisions of the Political Reform Act of 1974 for a lobbyist to deliver contributions from a client to an elected official; however, it is legal for clients to deliver such contributions. b6 b7C

[] once dined at Frank Fat's Restaurant with DONALD K. BROWN and []. During the meal, [] and BROWN attempted to take a receipt book from the waiter in order to use it at a later date when claiming their expenses. [] became embarrassed and did not remain at the table when they were trying to obtain the receipt book. [] was later asked to contact printers in the Sacramento area to find a printer who would print a Frank Fat's receipt book for BROWN. [] was not successful in finding a printer for this job; however, she did overhear a conversation BROWN was having with an individual, and they were discussing the printing of a Frank Fat's receipt book.

[] would pick up just bits and pieces of BROWN's activities, and on one occasion she learned that BROWN was arranging a meeting in San Francisco, California, with [] a businessman from Hawaii; a businessman from Tokyo, Japan; and Mayor GEORGE MOSCONE of San Francisco. This meeting had to do with the acquisition of or sale of land, possibly in Balboa Bay or Marina Del Sur, California, and MOSCONE was to act as an attorney for one or more of the parties present at this meeting. [] learned the meeting was scheduled to be held in Mayor MOSCONE's office; however, he contacted BROWN

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and told him he was concerned about a possible conflict of interest and would prefer not to have the meeting in his office. [redacted] learned the meeting was held in a motel in the San Francisco area.

[redacted] advised [redacted]
[redacted] would be able to recall numerous other incidents of interest to the FBI. [redacted] was advised that her cooperation was appreciated, and she should feel free to contact the FBI if she recalls anything which might be of interest to the FBI.

FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 5/26/77

[redacted]
[redacted]
[redacted] Clarksburg, California, employed as [redacted]
at [redacted]
[redacted], telephone
number [redacted], furnished the following information:

[redacted] was employed as
[redacted] for DONALD K. BROWN from [redacted]
[redacted]. She advised that she quit her job
with BROWN in order to obtain a better job with more
security and greater benefits. [redacted] advised that
while she was employed by BROWN [redacted]
[redacted] were also employed by BROWN.

[redacted] stated that [redacted]
[redacted] is familiar with the substance of
the legislation [redacted] This
would apply to [redacted] who was actually working
peace-meal work as opposed to working full time.
She stated that COHEN and [redacted] would do the
actual lobbying work and BROWN would enter into
the picture and make contacts at the time a bill
was coming up for vote, whether in the committee
or on the floor of the Assembly or Senate. [redacted]
stated that BROWN was not familiar with the substance
of legislation, however, he would do the glad handing
and patting on the back of those people who would
be responsible for passing the legislation.

[redacted] further advised that [redacted]
[redacted]
[redacted]
BROWN is a very crafty person and he would work on
his expense accounts for hours and then he would
send them to [redacted]
would review these accounts before forwarding them
to the Secretary of State's office in accordance
with the filing regulations for registered lobbyists.
[redacted] was of the opinion that BROWN had to work
hard on his expense accounts because he could not

Interviewed on 5/24/77 at Clarksburg, California File # SC 183-79

by SA RICHARD C. DONNER & 94
SA JOHN F. MULLIGAN/kmc Date dictated 5/25/77
Ronald Reagan-4470

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justify several expense items going to one particular assemblyman or senator, and would, therefore, have to break the expenses down and show them going to other individuals.

[] indicated that BROWN represented Summa Corporation and Hughes Airwest and his contact with them was through [] and NADINE HENLEY. She stated that BROWN would meet with LA SAGE in the Los Angeles area and in Sacramento, []

[] also advised that BROWN held several meetings in the Orange County Airport; however, she was not aware of any meeting between BROWN and [] a member of the Board of Supervisors of Orange County.

[] further advised that all money transactions were handled by BROWN and she does not know how money was received from BROWN's clients nor how contributions were made from his clients to elected officials in the State Capitol. b6 b7C

[] stated that during her tenure with BROWN, he seemed to be very close friends with State Assemblymen RICHARD ALATORE and LOU PAPAN, and State Senator WILLIAM CAMPBELL. BROWN was actively involved in legislation effecting the rights for mortgage brokers and his client for him was working in these matters was California Independent Mortgage Brokers Association.

[] stated that while she was there, BROWN did a lot of work with, and became friendly with, Assemblyman MOSCONE because he needed MOSCONE's backing on the bill involving the mortgage brokers. When it came time to vote on this bill, MOSCONE withdrew his support of the bill because he was running for Mayor of San Francisco, and he did not want to show a close relationship between him and DONALD K. BROWN by supporting the mortgage brokers bill.

[] advised that she felt BROWN was a man who could move mountains and had a reputation for getting things done no matter what the cost. She

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stated that she was not privy to any dealings regarding contributions to assemblymen and senators and BROWN was very careful not to let her know what was going on in this regard. She stated that after BROWN traveled to Los Angeles together with a client, he would return and then contact several assemblymen and/or senators and would sometimes ask her to take the day off, or even take the entire week off, so that she would not know what contacts he was making. [redacted] also stated that BROWN was careful to keep his family separated from his business contacts and also from his girlfriend. She stated that [redacted] at the time she worked for him, was [redacted] and she was employed [redacted] in downtown Sacramento.

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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 7/20/77

[redacted], business address [redacted]
[redacted] Sacramento, telephone [redacted], home tele-
phone [redacted], appeared at the Sacramento office of the FBI
with his attorney, [redacted] and furnished the
following information:

[redacted] advised he has been employed by Advocation,
Inc., which consists of three lobbyists [redacted]
[redacted], and DONALD K. BROWN. [redacted] advised BROWN is the
president of Advocation, Inc., [redacted]
[redacted] began employment with BROWN in April,
[redacted] and started working on a bill which was being lobbied
for his client, Pharmaceutical Manufacturers Association. b6
[redacted] stated he recalled this bill because it was the b7C
first bill he worked on for BROWN, and he lost the bill.

[redacted] described his position as being respon-
sible for reviewing pending legislation in the State Legis-
lature and furnishing their clients with copies of the bills
that they might be interested in. The clients would normally
respond by advising his office what bills they were interested
in and what position the lobbyist should pursue. [redacted]
stated he had very little personal contact with the clients,
and BROWN is responsible for finding clients and dealing
with them. [redacted] stated he does not handle any contacts
between his office and California Independent Mortgage Brokers
Association (CIMBA) because these contacts are handled by
[redacted].

[redacted] was asked if he was ever advised by an
assemblyman to disassociate himself from BROWN. MEDEIROS
answered that he had been advised by [redacted]
[redacted] to disassociate himself from BROWN; however, [redacted]
would not give any reason for this advice.

[redacted] further advised he has never heard of a
check from a client being sent to BROWN's office and subse-
quently being delivered by BROWN to an assemblyman or senator.
He also offered that he has never offered a bribe to a member
of the Legislature, nor has he ever been solicited for a bribe

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Interviewed on 7/14/77 at Sacramento, California File # SC 183-94-
by SA JOHN F. MULLIGAN and
SA DON E. TRAUGHER JFM:smd 97 Date dictated 7/15/77
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by a member of the Legislature. [] also denied any knowledge of a check being received by BROWN from Dow Chemical and delivered by BROWN to []

[] advised he considers BROWN an honest lobbyist and knows of no illegal activity going on in the office of BROWN.

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FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 8/4/77

[redacted] telephone 444-5524, was interviewed at the Sacramento Office of the Federal Bureau of Investigation regarding her knowledge of DONALD KENT BROWN.

[redacted] advised that at the time she met BROWN, she was employed by [redacted] as [redacted]. She advised that last fall she had a party at her residence and D. K. BROWN was invited and attended this party. They spoke to each other regarding mutual interest and got along well together. She and BROWN would go to lunch together on occasion and he talked to her about his early childhood when he was prevented from going to school because of a respiratory ailment, and [redacted] advised she thought of BROWN as a substitute father. b6 b7C

[redacted] further advised that BROWN was very close to his mother and she learned that his mother died last July and BROWN was in Oregon taking care of his mother's estate. BROWN also told [redacted] that his wife is not a well person and is suffering from diabetes.

[redacted] advised that BROWN and she refrained from discussing legislation and political matters because they were often on opposite sides of issue. For example, BROWN was pushing a bill which would give the State of California the authority to impose rent control thereby taking this authority away from the local governments, and [redacted] was very much against this type of bill.

[redacted] further advised that BROWN considers [redacted] to be a close friend and also NADINE HENLEY of Summa Corporation. [redacted] stated she and BROWN are still close friends as they get along well together and are comfortable together. She stated she does not like to socialize and would not go drinking in bars by herself. She advised that BROWN does not drink and does not take part in the social scene at the Capitol.

Investigation on 8/2/77 at Sacramento, California File # SC 183-94
by SA THOMAS P. GRIFFIN and
SA JOHN E. MULLIGAN JEM:mm1 Date dictated 8/3/77
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[redacted] advised that she once heard a rumor regarding a possible bribe when she was working as a Legislative Consultant in late 1973 or early 1974. She stated that the Assembly passed a bill allowing public employees the right to collective bargaining and the bill was sent to the Senate where it was sent to one of the committees in the Senate. She stated that Speaker of the Assembly ROBERT MORETTI was interested in this bill and she heard that the Senate Committee consisted of five members and only two members were going to vote favorably for the bill. She heard that [redacted]
[redacted]

[redacted] approached MORETTI and requested money to vote in favor of the bill. She stated that [redacted] may have been [redacted] at that time, however, she could not recall the amount of money requested by WHITMORE. [redacted] stated that to her knowledge, no money was paid to [redacted] and the bill was not voted out of Committee.

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INTERVIEW OF JESSE MARVIN UNRUH

FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 6/2/77

JESSE MARVIN UNRUH, Treasurer, State of California, accompanied by his attorneys JACK ORMES and JACK SCOTT, appeared at the offices of Assistant United States Attorney (AUSA) STEPHEN V. WILSON for the purpose of being interviewed by SA NORBERT R. LINKER of the Federal Bureau of Investigation (FBI). The interview commenced at 1:45pm and prior to directing questions to Mr. UNRUH, he was informed that through arrangements previously made with the United States Attorney's (USA) Office and his attorneys, SA LINKER was not to afford him his Miranda rights.

The following is a breakdown of the areas of questioning directed to Mr. UNRUH during this interview:

PACIFIC HOLIDAY TOWERS
APARTMENTS
1900 East Ocean Boulevard
Long Beach, California

Mr. UNRUH was informed that the FBI was in possession of allegations indicating that he and possibly other partners in this investment exerted influence and/or bribes to Federal Housing Administration (FHA) officials to enable his group to acquire that building from FHA for \$4,100,000. Mr. UNRUH was then asked to supply a chronology of his involvement in the Pacific Holiday Towers, after which he offered the following:

He stated that on or about 1965, he was contacted by an unrecalled member of the group which ultimately became limited partners within this venture. He stated that the person to whom he refers inquired as to whether he would be interested in joining the limited partnership in the completion of this structure which had recently gone bankrupt. He stated that he accepted the invitation to join the partnership which consisted of approximately 10 individuals, among whom

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Interviewed on 5/26/77 at Los Angeles, California File # Los Angeles 183-169
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by SA NORBERT R. LINKER/lkp Date dictated 5/27/77
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were included JOSEPH BALL, GEORGE HART, SAMUEL C. CAMERON, HANK RIDDER, ANDREW RAWN, and a few others whose names now escape him. UNRUH pointed out that he was never actively involved in any negotiations with the John Hancock Insurance Company who loaned his group approximately \$6,800,000 and, further, wanted to offer that, to the present time, he has regretted his involvement in this venture as in the event that the building is sold he would suffer a considerable tax recapture on the depreciation which he has claimed since he has become involved in this endeavor.

He stated that he became aware of a foreclosure procedure by John Hancock in either 1969 or 1970 and was told that FHA had then taken over the building as a result of their guarantee on the initial loan from John Hancock. He advised that he again wanted to point out that he was not brought into any discussions or negotiations with officials of the FHA at the point in time when they took over as mortgagors of the property.

He advised that at a point in time in 1971 or 1972, he learned from an unrecalled partner that a Mr. SIDNEY GOODMAN of Minneapolis, Minnesota, had entered into the picture and it ultimately developed that Mr. GOODMAN secured private capital and acquired the building from FHA for approximately \$4,100,000. He related that the contractual arrangements between his partnership and Mr. GOODMAN called for GOODMAN to manage the building, including the collection of rents, and was to derive a 10 percent or thereabout percentage of the limited partnership. UNRUH stated that he was also aware that among the other contractual arrangements reached with Mr. GOODMAN was the fact that should the building ultimately be sold he, GOODMAN, was to receive 50 percent of the proceeds from the sale whereas the other remaining partners were to split the other 50 percent of the sale price proportionate to their respective interests.

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UNRUH stated that, to the best of his recollection, he never entered into any negotiations or conversations with FHA officials in California or in Washington, D.C., to persuade them to sell the building for \$4,100,000 to GOODMAN and the other partners. He advised that he has no personal recollection or knowledge that any other members of his partnership exercised any influences or bribes upon FHA officials to effect the sale to his group.

Regarding Mr. GOODMAN, UNRUH stated that he may have met him on one occasion at a cocktail party four or five years ago and could only offer that GOODMAN was understood to have specialized in the acquisition of distressed FHA properties. He advised that he has never heard from any member of the partnership or anyone else that GOODMAN extended bribe offers to officials of FHA in order to acquire the building for the sale price of \$4,100,000. Mr. UNRUH was then referred to information received by the FBI which alleges that his partnership secured the services of a "front man" to acquire an oceanside lot adjoining the Pacific Holiday Towers which became available through a Federal bankruptcy procedure and that the allegation indicated that one or more members of his partnership then influenced the City of Long Beach to acquire that beach front lot at twice what his group had paid during the bankruptcy sale. UNRUH responded by advising that he had heard that his group had in fact acquired a lot adjoining the Pacific Holiday Towers within the past three or four years but was unaware of who "fronted" the acquisition or what price the City of Long Beach subsequently paid for it. He stated that he again wanted to make it clear that he never became involved in any of the financial transactions in the partnership and, for that reason, can not confirm nor can he deny that the matter which was just cited to him did not occur.

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Mr. UNRUH advised that he and his other limited partners have over the years declared their respective percentage of depreciation and interest on the property. Mr. UNRUH was then asked and denied ever having met FHA officials EDWARD P. CALLAHAN, former Director of the Area Office of FHA, or Technical Service Supervisor of FHA, Mr. GORDON HUNT.

Mr. UNRUH advised that at no time during his involvement with this project has he ever invested a dollar of his own money.

CAMPAIGN CONTRIBUTION
DISCLOSURES

Mr. UNRUH was referred to information developed which indicated that upwards of \$67,000 in campaign contributions from the Los Alamitos Racetrack, Los Alamitos, California, were directed to his various campaign committee operations during the years 1968 through 1970, and that campaign records for his 1970 Gubernatorial campaign of 1970, as filed with the California Secretary of State, failed to reflect any of those monies as having been received.

At that point, SA LINKER displayed to Mr. UNRUH and his attorneys checks from Los Alamitos to his aforementioned campaign committee in the following amounts: \$50,000, \$10,000, \$5,000, \$2,000, and \$1,250. After examining the aforementioned checks, Mr. UNRUH and his attorney, Mr. JACK SCOTT, advised that Mr. UNRUH's long-time associate and treasurer for his various political campaigns during the past 20 years, Mr. MANNING POST, had secured a "Legislative Counsel Opinion" in 1969, and prior to mid-November 1969, when new political campaign reporting laws came into existence, that monies directed to trust funds as in the case of the \$50,000 offered by Los Alamitos to the "J.M.U. Trust for Governor" were not required to be itemized but rather grouped into a lump sum contribution. Mr. UNRUH directed SA LINKER's

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attention to the fact that the check in the amount of \$50,000 was dated September 16, 1969, and was deposited into his trust account at the City National Bank on September 20, 1969, which date was approximately two months prior to mid November of that year when new campaign reporting laws became effective.

Mr. SCOTT, Mr. ORMES, and Mr. UNRUH each indicated at this point that a "Legislative Counsel Opinion" on the matter of campaign trust accounts was available to the FBI for its inspection at any time but that, regrettably, they did not have a copy of the "Legislative Counsel Opinion" with them at that time.

Mr. UNRUH was then referred to [REDACTED]

[REDACTED] which had been produced by [REDACTED] to the Federal Grand Jury on May 25, 1977. He was further directed to review [REDACTED]

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The second document to which he was referred is a handwritten note by SCHOTT directed presumably to a secretary employed in the campaign which indicated that a check in the amount of \$5,000 and a receipt for CAMERON to sign and return for the \$5,000 was mailed on October 2, 1969. Mr. UNRUH was then asked to explain the events leading up to the advance of \$5,000 to Mr. SAMUEL CAMERON, manager of the Long Beach Independent Press Telegram. UNRUH advised that Mr. CAMERON and he have long been friends and CAMERON has actively supported his various political campaigns over the past years. He stated that as his memory serves him, Mr. CAMERON intervened with the Los Alamitos Racetrack in 1969 and was successful in securing a contribution from that track in the amount of \$50,000. He stated that shortly after the \$50,000 was transmitted to the J.M.U. Trust account and deposited into the City National Bank,

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Pershing Square Branch, where that account was maintained, Mr. CAMERON contacted him and requested \$5,000 for an unrecalled use. UNRUH stated that the \$5,000 which CAMERON received was understood by him to be a loan and was to be repaid within a reasonably short period of time. He advised that regrettably the money has not been repaid to him to date. UNRUH stated that on the afternoon subsequent to Mr. CAMERON's first interview by the United States Attorney and the FBI, he happened to meet CAMERON at a local downtown restaurant by accident, during which time the matter of the \$5,000 which CAMERON had borrowed was brought up. UNRUH stated that, as he recalls, CAMERON indicated that the \$5,000 was used by him for the support of other political figures and that CAMERON had paid the necessary income tax on the money.

Mr. UNRUH was then displayed checks in the amount of \$5,000, \$5,000, \$5,000, \$10,000, \$5,000, and \$5,500, which were made payable by the Los Alamitos Racetrack in the years 1968, 1969, and 1970, to the "Democratic Assembly Fund" or the "Democratic Legislative Campaign Committee." After examining the photostat copies of the aforementioned checks, Mr. UNRUH stated that he could not offer any explanation as to what those accounts represented and indicated that he had nothing whatsoever to do with the maintenance of those accounts or the disbursement of cash from those accounts for political purposes.

The subject of campaign contributions received by Mr. UNRUH and the fact that certain monies were not reflected in filings to the Secretary of State was concluded by UNRUH offering that his attorneys will immediately secure a copy of the "Legislative Counsel Opinion" regarding trust fund accounts for political purposes to the FBI at the earliest possible date.

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QUEEN MARY AND TIDELAND
OIL TRUST RELATED MATTERS

Mr. UNRUH was advised that the FBI was in receipt of allegations indicating that certain political payoffs were made to members of the State Lands Commission and others in State Government, including Assemblyman WILLIE L. BROWN, JR., for their respective support of Long Beach's Queen Mary project. He was advised that it was alleged that members of the State Lands Commission were paid off in the form of political contributions to continue their support of the Queen Mary project which was being renovated with State Tideland Oil money which the State Lands Commission controlled. He was advised further that the allegation relative to Assemblyman WILLIE L. BROWN, JR., pertains to the payoff to BROWN by Long Beach interests to get him to discontinue his efforts to rescind the State Tideland agreement with the City of Long Beach. Mr. UNRUH stated that he has heard many rumors from unrecalled sources concerning the Queen Mary project, but could offer nothing of a specific nature concerning this matter. He stated that he has a vague recollection of a subcommittee headed by Mr. BROWN that was making inquiries concerning the expenditure of State Tideland Oil monies for the renovation of the Queen Mary, but had no additional information regarding the results of the BROWN hearings.

Mr. UNRUH was then asked whether his wife and daughter were aboard the Queen Mary on its final voyage from South Hampton, England, to its permanent berthing in Long Beach, California.

UNRUH stated that his wife and daughter were, in fact, aboard the Queen Mary on its final voyage and that it was his understanding that their fares were gratis, but he did not know who was responsible for the payment of his wife's and daughter's fares. Mr. UNRUH was then asked whether he was aware that State Lands

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Commission member Lieutenant Governor REINECKE and State Controller HOUSTON FLOURNOY and their families were aboard the Queen Mary on its final voyage. Mr. UNRUH stated that, since he was not aboard, he has no information to offer concerning Mr. FLOURNOY and Mr. REINECKE and their respective families being on the vessel during this last trip.

[REDACTED]
HIS ASSOCIATION WITH UNRUH,
STATE CONTROLLER KENNETH CORY,
AND RICHARD O'NEIL

As this area of the discussion was offered by SA LINKER, Mr. UNRUH and his attorneys objected and indicated that they did not wish to "re-hash" UNRUH's relationship with [REDACTED] as it has previously been the subject of investigations by the Orange County District Attorney's Office, the Los Angeles County District Attorney's Office, and the California State Attorney General's Office, and that, in their judgment, that matter has been concluded.

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It is to be noted that the investigation to which Mr. UNRUH and his attorneys referred involves the "sale" of \$10,000 worth of campaign furniture which was located in UNRUH's 1974 campaign headquarters when he successfully ran and won the election for Treasurer of the State of California. Investigation further revealed that [REDACTED] instructed one of his associates to supply UNRUH with \$3,000 cash subsequent to [REDACTED] "acquisition" of the campaign furniture in order to cover the taxes that UNRUH would have had to declare on the aforementioned sale. The investigation by the aforementioned agencies further disclosed that the furniture in question was dilapidated, collapsible furniture whose value could not have exceeded \$300 and which, when picked up, was placed

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in an open field where it has remained to this date. It is understood that the aforementioned investigative agencies could not bring forward an indictment against UNRUH in this matter as, although they had secured admissions from the individual who had paid UNRUH the \$3,000 to cover the taxes on the "sale" it was a one-on-one situation and the prosecutors and the Attorney General did not feel that they could sustain a conviction against UNRUH for lack of corroborating evidence.

Mr. UNRUH was asked before the matter of [redacted] was terminated whether he had learned that [redacted] who had received in excess of \$500,000 in campaign contributions from [redacted]; and Orange County businessman RICHARD O'NEIL, were currently partners in a real estate operation in Northern California at this time.

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Mr. UNRUH stated that he has no evidence to offer that [redacted] and O'NEIL were in fact in a partnership in a real estate venture at this time, although he admitted that he has heard from unrecalled sources that this was the case.

OFFERS OF BRIBES DIRECTED
TO UNRUH WHILE IN
PUBLIC OFFICE

Mr. UNRUH was informed that the FBI was in receipt of allegations indicating that he had received offers of bribes during his years as an elected California State official. He was further advised that the FBI was most desirous of securing his cooperation in this area of their investigation and, further, that if bribe offers have been received by him and, presumably, rejected, he would not be culpable whereas those who offer the bribes would be.

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Mr. UNRUH stated that in his long years as an elected public official he can not recall ever having been approached by anyone to accept monies to move favorably on legislation which would benefit the briber or those whom he represents.

UNRUH stated that he was interested in ascertaining how he was brought into this aspect of the FBI's investigation as he has no recollection of any offers of monies ever being made to him.

SA LINKER then asked UNRUH whether he is familiar with a company doing business as Tennaco and, further, whether representatives of that company have ever been in contact with him regarding their business problems. UNRUH stated that Tennaco Corporation has had a 10 year feud which involves to a degree the El Paso Gas Company over gas and oil pipeline rights. He stated that he vaguely recalls a lobbyist by the name of CHARLES (last name unknown) (LNU), whom he characterized as "wild," who represented Tennaco in the mid 1960s, but that to the best of his recollection neither the aforementioned lobbyist CHARLES (LNU) nor representatives of Tennaco have ever contacted him regarding that company's legislative needs.

UNRUH was then asked whether or not he recalls anyone representing Tennaco's interest ever having offered him \$175,000 a year for 20 years to intervene with then President LYNDON B. JOHNSON to have Government approval of Tennaco's proposed plans to increase their pipeline rights. Mr. UNRUH stated that he would have certainly recalled an offer to him of that considerable amount of money for his efforts and emphatically denied that an offer of that type had ever been made.

Mr. UNRUH was then asked whether he had ever had any association with lobbyists or officers of the California Mortgage Brokers Association or representatives

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of the California Housing Council. UNRUH responded by stating that over his years as a member of the Assembly, the California Housing Council and the Independent Mortgage Brokers Association have regularly had bills before the State Assembly which would have benefited those two organizations. He advised, however, that in neither case had representatives of those groups ever attempted to influence him or attempted to gain his support for their legislation. He has no recollection of any offers of bribes ever having been directed to him by representatives of the aforementioned two groups.

UNRUH was then questioned as to whether or not he was acquainted with a ROBERT BROWN, California lobbyist who represented one or more farm owners groups. UNRUH stated that he knows Mr. ROBERT BROWN but, to the best of his recollection, has never had occasion to converse with BROWN on any matter.

Mr. UNRUH was then questioned as to whether he was acquainted with another registered lobbyist, one JEFF PEYSER, who was understood to have been active during the period of time that he was Speaker of the State Assembly. UNRUH advised that he has known Mr. PEYSER for a number of years, but again pointed out that PEYSER, to the best of his recollection, never contacted him regarding legislative issues that would have affected any of his clients.

UNRUH stated that the California Independent Mortgage Brokers group have introduced controversial legislation at Sacramento, California, on a number of occasions during his tenure as an elected State Assemblyman. He advised that, to the best of his recollection, neither officers of the association nor their retained lobbyists ever approached him with offers of bribes in an effort to move favorably towards their needed legislation.

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UNRUH further offered that, to the best of his recollection, he has never been offered an interest in or stock of a corporation which was endeavoring to secure legislation favorable to them during his tenure as a State Assemblyman.

He advised that since 1974, he has held the position of State Treasurer and his duties have kept him out of the political arena since his election. UNRUH further offered that Sacramento is a beehive of rumors, exaggerations, and political opportunists. He stated that it is not uncommon to be frequenting a bar or restaurant principally patronized by political types and hear enumerable versions of one particular story as the evening and drinking wears on. He stated that it is rare when one would ever hear a near factual story or incident as related in these bars and restaurants as those in favor of particular legislation would be pushing one version and their objectives whereas the opponents of the legislation would be attempting to sway those listening as to the adverse affects of the particular bill in question. UNRUH stated that he felt confident that the FBI was not interested in this type of barroom talk as, in his judgment, those types of stories would not have any credence or investigative value.

UNRUH advised that he would like to offer a particular story which has recently come to his attention providing he had the opportunity to discuss privately the incident with his attorneys. UNRUH and his attorneys SCOTT and ORMES thereafter excused themselves from the office of AUSA WILSON and conferred privately for approximately five minutes.

Upon UNRUH's and his attorneys' return, UNRUH offered that he had recently been reliably informed that a Teamster sponsored bill was recently introduced into committee hearings by Orange County State Senator PAUL CARPENTER and that the bill essentially called for

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the prohibition of sale of all pasteurized beers in the State of California. He advised that he came to learn that the only pasteurized processed beer sold in the State of California was Coors. He advised that his information indicates that on learning of the proposed bill which would have prohibited the sale of Coors in the State of California, Coors retained a registered lobbyist at Sacramento and it has been alleged that this unknown lobbyist commenced disseminating large contributions which could be construed as payoffs to members of the Senate subcommittee and just recently that Teamsters sponsored bill died at that level.

When asked whether UNRUH was suggesting that the aforementioned matter be pursued by the FBI, he responded with "it might be well worth your while to look it over."

SIDNEY R. KORSHAK

UNRUH was questioned as to whether or not he has been acquainted with SIDNEY R. KORSHAK.

UNRUH advised that a four-part story on KORSHAK appeared in consecutive issues of the New York Times in mid 1976, and in one of those articles he, UNRUH, was alleged by the authors of the article to have been a close associate and friend of KORSHAK.

UNRUH stated that one of the authors, Pulitzer prize winner SEYMOUR HIRSCH, directed a letter to him subsequent to the publishing of the article in which he advised UNRUH that the meetings which he and KORSHAK attended were not to be construed as conspiratorial in nature and that HIRSCH was not attempting to imply or infer that UNRUH was meeting with KORSHAK for criminal reasons.

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UNRUH stated he has met KORSHAK on one, possibly two occasions, the purpose of which is now unrecalled, and that he has never considered KORSHAK a close associate or friend as spelled out by HIRSCH in his aforementioned New York Times articles.

UNRUH and his attorneys SCOTT and ORMES were advised that the FBI was most anxious to secure a copy of the Legislative Counsel's Opinion wherein they indicated that UNRUH could withhold from filings with the Secretary of State those campaign contributions received prior to mid November 1969.

In response, Mr. SCOTT advised that he will immediately contact UNRUH's campaign treasurer, MANNING POST, and request that a copy of the Legislative Counsel Opinion be reproduced for SA LINKER and the United States Attorney's Office.

Prior to concluding the interview with UNRUH, he advised that he appreciated the fact that the FBI had not taken it upon themselves to divulge to the press the fact that he was under investigation as a result of alleged misuse of campaign contributions. As the meeting drew to a close, UNRUH advised that he expected the FBI to continue to treat their investigation in a confidential manner with the press and news medias. He further offered that he did not have the same confidence in the United States Attorney's Office in that past experiences have indicated that they have intentionally leaked his difficulties with the Justice Department to the various news media. In response, AUSA WILSON advised UNRUH and his attorneys that neither he nor other members of his office plan to divulge any information regarding the results of this interview with the news media.

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INTERVIEWS WITH MEMBERS OF THE
CALIFORNIA STATE LEGISLATURE

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NRL/LMR

The following investigation was conducted by SA NORBERT R. LINKER:

On April 13, 1977, SA LINKER received a telephone call from California State Assemblyman LOUIS J. PAPAN, at Sacramento, California. PAPAN indicated he desired to converse with SA LINKER at his (PAPAN's) offices in the State Capitol Building, Sacramento, on the following day.

At 9:15 a.m., April 14, 1977, SA JOHN F. MULLIGAN, of the Sacramento Office, and SA LINKER met PAPAN at his State Capitol office. Present with PAPAN at the time of the meeting was California State Senator DENNISE. CARPENTER.

At the outset of the meeting with PAPAN and CARPENTER, they both advised they were formerly Special Agents of the FBI.

PAPAN advised that California Registered Lobbyist LESLIE H. COHEN had informed him on the previous day that he had been interviewed by the FBI and that a portion of that interview pertained to COHEN's former associate, Lobbyist DONALD KENT BROWN. Mr. PAPAN stated according to COHEN, the FBI quiered him regarding any knowledge which he might have to indicate that DONALD KENT BROWN was involved in any type of criminal activities.

PAPAN stated he has had a long standing acquaintanceship with DONALD BROWN and wanted to inform the interviewing agents that in his judgement BROWN was an ethical lobbyist.

PAPAN stated that both he and Mr. COHEN have had recent conversations with BROWN and have ascertained that BROWN is very concerned over the fact that the FBI has been making inquiries regarding BROWN's lobbyist activities, ethics, and associates. PAPAN stated that BROWN's wife is ill at the present time, and her condition, coupled with the inquiries by the FBI concerning him, have disturbed him greatly.

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NRL/LMR

PAPAN stated Sacramento is a "political rumor factory", and once word of the FBI's interest in BROWN circulates throughout the political scene, BROWN's reputation may be severely damaged.

Mr. PAPAN stated in his judgement the FBI should interview DONALD BROWN as soon as possible in order to clarify BROWN's position visa vie any allegations against him.

Senator CARPENTER advised he was present at this meeting in order that he, like PAPAN, could offer that in his judgement Lobbyist DONALD KENT BROWN enjoys an impeccable reputation as a lobbyist in Sacramento.

CARPENTER advised that Mr. BROWN recently contacted him to determine his willingness to meet with an unidentified executive of the Sohio Oil Company for the purpose of discussing Sohio's needs for legislative approval to build the necessary oil receiving terminals in California to receive Sohio's portion of northern slope of Alaskan oil. Senator CARPENTER stated in his contacts with Mr. BROWN he has found him to be extremely professional and extremely competent as a lobbyist as evidence by the fact that he has very important clientel.

PAPAN and CARPENTER both offered that Proposition Nine, which became law in 1975, placed certain prohibitions upon lobbyists acting in behalf of clients. They advised one of the prohibitions placed upon lobbyists is that they can no longer handle or transmit campaign contributions from clients to legislators..

Both PAPAN and CARPENTER advised that in their judgement, the California State Assembly and State Senate are composed of a majority of honest, ethical, and sincere individuals.

CARPENTER and PAPAN both offered they have heard unsubstantiated rumors regarding a small number of assemblymen and senators who are alleged to be approachable for a price.

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NRL/LMR

CARPENTER illustrated his point by advising he is currently watching closely a bill offered by a senator, whom he did not desire to identify by name. The bill is basically anti-horse racing in scope, and he feels it will ultimately die before it reaches committee hearings or legislative vote. The author of this particular bill may be using the bill itself as a means of subtle extortion for campaign contributions from the race track interest. If those contributions are forthcoming, the particular author of this legislation will withdraw it from further consideration.

CARPENTER stated authors of controversial bills of this type have been known to withdraw their legislative measures abruptly and theorized that there withdrawn after the author has received either legal or illegal contributions.

CARPENTER advised he plans to follow the aforementioned anti-racing bill closely, and upon receipt of any information which indicates that the author has received legal or illegal contributions from racing interest, he will immediately notify the FBI.

The meeting with PAPAN and CARPENTER was terminated after they both concurred that it would be in the FBI's interest to interview lobbyist DONALD BROWN as soon as possible.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 8/18/77

LOUIS J. PAPAN, California State Assemblyman, 19th District (San Mateo County), was telephonically contacted. He was informed that this telephone call was made in response to a telephone call he had made to the Special Agent in Charge of the FBI San Francisco Office concerning an investigation being conducted by Special Agents of the FBI at the State Capitol in Sacramento.

Mr. PAPAN said he had telephoned the Special Agent in Charge of the San Francisco Office because he was concerned about an investigation presently being conducted by the FBI at the State Capitol. He said two Special Agents had been to see him, and he believed both Agents were from the FBI Los Angeles Office, and, because he did not know the individual in charge of the FBI Los Angeles Office, he called the FBI San Francisco Office.

Mr. PAPAN was advised that the Special Agents who had previously contacted him concerning an investigation at the State Capitol were Special Agent NORBERT R. LINKER of the FBI Los Angeles Office and Special Agent JOHN F. MULLIGAN of the FBI Sacramento Office. He was also advised that the Sacramento Office is the office that is in charge of this investigation.

Mr. PAPAN stated he has no complaints to make concerning this investigation, but he wanted to be assured that the FBI was not investigating every possible complaint that was brought against Assemblymen and State Senators in California. He was so assured, and it was noted that the FBI just does not have the manpower to investigate every allegation; nor do we have the jurisdiction to investigate every allegation.

Mr. PAPAN also hoped that the matter would be discussed with one of the attorneys in the United States Attorney's Office. I informed him that I was not aware whether this matter had been discussed with a member of the United States Attorney's Office; however, in such matters our Agents will discuss the facts of the case with the United States Attorney's Office at an early stage to be assured that the United States Attorney's Office thinks the case is worthy of investigation.

Ronald Reagan-4496

Interviewed on August 10, 1977 at Sacramento, California File # SC 183-94

by Special Agent in Charge RICHARD E. WHITE Date dictated August 16, 1977

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I informed Mr. PAPAN that, although he had no complaints to make, if anything came to his attention which he would consider an impropriety on the part of the FBI, I would appreciate his notifying me as soon as possible.

Mr. PAPAN advised he appreciated my call.

FEDERAL BUREAU OF INVESTIGATION

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8/4/77

Date of transcription

Assemblyman RICHARD D. HAYDEN, State Capitol Building, Room 4164, furnished the following information:

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HAYDEN advised that he is familiar with DONALD KENT BROWN and [REDACTED]. HAYDEN advised that [REDACTED] and he are friends and he feels [REDACTED] is a competent lobbyist who argues the facts regarding a bill and does not try to influence legislators through socializing. HAYDEN said he once told [REDACTED] to get away from D. K. BROWN because he believed [REDACTED] would be better off on his own in view of his competence as a lobbyist.

HAYDEN went on to explain that the old type lobbyist did not address the merits of legislation and would socialize with legislators and expected legislators to vote in line with their friendships. The new lobbyist present bills to legislators and give both sides of the bill and state the reasons for their clients backing the bill. HAYDEN said the new lobbyist are younger and better educated than the old type lobbyist.

HAYDEN was asked whether he would say D. K. BROWN was an old or a new type of lobbyist. He advised that BROWN was somewhere in between and stated that he only met BROWN on six occasions and would talk to BROWN about BROWN's association with Summa Corporation owned by HOWARD HUGHES. HAYDEN advised that he is very curious about HOWARD HUGHES and he asked D. K. BROWN if he had ever talked with or met HOWARD HUGHES. BROWN told him that he was present during a meeting of the Board of Directors of the Summa Corporation and they would talk with HOWARD HUGHES over intercom system. HAYDEN stated that is the extent of his knowledge and relationship with DONALD KENT BROWN.

HAYDEN further advised that in June, 1977 just prior to the summer recess, Assemblyman PAUL PRIOLO called for a Republican caucus and asked that it be a closed caucus. HAYDEN stated that the members of the caucus were upset because they had agreed not to call any close caucus and wanted them open to the press and the public. In the caucus meeting,

Interviewed on 8/2/77 at Sacramento, California File # SC 183-94

by SA THOMAS P. GRIFFIN and
SA JOHN F. MULLIGAN JFM:mm1 Date dictated 8/3/77

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PRIOLI stated that his office received either a phone call or a mailgram, HAYDEN could not recall, stating that the money would be forthcoming if certain action was taken relative to Assembly Bill 450 which was authored by Assemblyman TERRY GOGGIN. HAYDEN advised this bill related to rent control of Mobile homes. PRIOLI also stated at the caucus that Assemblymen WALTER INGALLS and WILLIAM CRAVEN also received the same offer of money. HAYDEN further advised that he did not know what organizations or lobbyist made the offer of money or were interested in this bill.

Ronald Reagan-4499

FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 8/11/77

Assemblyman PAUL PRIOLO, State Capitol Building, Room 2128, furnished the following information:

PRIOLO advised he received a telegram on June 23, 1977, from NORMAN L. MC ADOO, Treasurer, Mobilehome Park Owners' Political Action Committee, advising that a contribution of \$1,000 would be forthcoming directed to PRIOLO's campaign account. PRIOLO advised the following day, he was to vote on Assembly Bill (AB) 450 authored by Assemblyman TERRY GOGGIN, which related to mobilehome park tenancies. PRIOLO said he did not think he should accept the contribution because it was sent the day before the vote was to be taken on a bill regarding mobilehome parks. PRIOLO decided to return the check when it was received, and he called a meeting of the Republican Caucus and advised them of the action he was going to take.

PRIOLO further advised Assemblymen WALTER INGALLS and WILLIAM CRAVEN also received promises of contributions and returned the checks when they were received. This matter was brought to the attention of Assembly Speaker LEO MC CARTHY, and he forwarded this information to the Fair Political Practices Commission. PRIOLO stated these contributions were not considered illegal; however, he felt it compromised his position to accept a contribution the day before voting favorably on the bill. PRIOLO stated to his knowledge, CRAIG BIDDLE, lobbyist for the mobilehome park owners, was not aware of the fact these contributions were going to be made.

PRIOLO was then asked if he was familiar with lobbyist DONALD KENT BROWN, at which time he advised he knows BROWN but does not care for him. He stated BROWN does not actively seek assistance from the Republican side of the Assembly and, therefore, he does not have much contact with BROWN. PRIOLO advised BROWN is an influential lobbyist, and he heard that BROWN and Speaker MC CARTHY worked together to pass AB 3788 during the 1976 Session. He stated this bill related to rent control and was backed heavily by the California Housing Council. He stated he was in favor of this bill;

Investigation on 8/9/77 at Sacramento, California File # SC 183-94

by SA JOHN F. MULLIGAN and
SA THOMAS P. GRIFFIN JFM:smd Date dictated 8/10/77

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however, he was surprised to see that there were also liberal Democrats in the Assembly voting favorably for the bill. PRIOLO said this bill was passed; however, it was later vetoed by the Governor.

PRIOLO stated he was aware that the FBI had been investigating DONALD KENT BROWN and other allegations in Sacramento regarding political corruption. PRIOLO intimated that even though the California political system is well thought of as free of corruption, he does know of individuals in the State Senate who have a reputation for acting unscrupulously. After some discussion with PRIOLO, he admitted that two of these individuals in the State Senate would be Senator ALFRED SONG and Senator RALPH DILLS. PRIOLO could not furnish detailed information regarding the unscrupulous activity of either of these men; however, he did state DILLS is chairman of the Governmental Organization Committee and has been known to tell committee members the night before the committee was to meet which bills would be passed and which bills would be killed in the committee. PRIOLO assumed that this policy angered several of the individuals on the Governmental Organization Committee, and he feels that is why the rumors were spread regarding Senator DILLS.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 8/19/77

Assemblyman WALTER M. INGALLS, State Capitol Building, Sacramento, California, furnished the following information:

INGALLS advised that on or about June 23, 1977, his office received a phone call from Mr. NORMAN L. MC ADOO, Treasurer, Mobilehome Park Owners Political Action Community, advising him that a contribution to his campaign in the sum of \$1,000 would be forthcoming. INGALLS stated that he would normally accept such a contribution, however, there was a vote scheduled on Assembly Bill 450 which related to mobilehome park tenancies the following day. In view of this scheduled vote, INGALLS stated he returned the check for \$1,000 immediately after it was received, and he later learned that Assemblymen WILLIAM CRAVEN and PAUL PRIOLO had also returned checks that they received on the same date.

INGALLS further advised that the registered lobbyist for the Mobilehome Park Owners Association is CRAIG BIDDLE. INGALLS stated that to his knowledge BIDDLE never would make such a contribution so close to the time a vote was to be taken. INGALLS advised that his office contacted BIDDLE and BIDDLE knew nothing about the \$1,000 contribution.

INGALLS was then asked if he was familiar with Lobbyist DONALD KENT BROWN. INGALLS stated that he was familiar with BROWN and BROWN's wife and he regards D. K. BROWN as one of the most professional men in the business. INGALLS advised that he has spoken to BROWN regarding BROWN's association with Suma Corporation and BROWN told him that he had been recruited to work for Suma Corporation by NADINE HENLEY. INGALLS also recalled receiving a contribution of \$500 in 1972 and the contribution was given to him by D. K. BROWN who stated that it should be reported as coming from Mr. HOWARD HUGHES' personal account. INGALLS stated he had very good recollection regarding this check as he was very impressed with receiving funds from HOWARD HUGHES personally. INGALLS further advised that he received a check for \$750 in 1974 from Suma Corporation, however, he could not recall

Investigation on 8/15/77 at Sacramento, California File # SC 183-94 -17
by SA THOMAS P. GRIFFIN & SA JOHN F. MULLIGAN JFM/ab 126 Date dictated 8/17/77
Ronald Reagan-4502

SC 183-94

how these funds were transmitted to him. INGALLS said the interviewing Agents may review the records of his campaign contributions which are kept at the CPA firm of E. T. Jacobos, Riverside, California.

Ronald Reagan-4503

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INTERVIEW OF LOBBYIST BRUCE ROBERTS

FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 6/24/77

WILLIAM BRUCE ROBERTS, Registered Lobbyist, whose clients include the Associated General Contractors of California, Incorporated; California Council of Independent Oil Companies; and Governmental Relations Association, was interviewed for the purpose of gathering information which Mr. ROBERTS had previously indicated might be of interest to the Federal Bureau of Investigation (FBI) relative to State corruption.

Mr. ROBERTS advised that he and fellow lobbyists in Sacramento, California, have heard various rumors indicating that the FBI was engaged in investigations regarding corrupt governmental activities at the State level and, for that reason, wanted to share with the interviewing Agents information which he felt might be of interest in this area.

ROBERTS advised that one of the rumors circulating among fellow lobbyists is the fact that lobbyist DONALD KENT BROWN has been the subject of FBI inquiry during recent weeks. ROBERTS stated that he and others in his profession have been curious to know why BROWN has been so successful in securing lucrative contracts from nationwide corporations, among whom are included Dow Chemical Company, Summa Corporation, and the Sohio Oil Corporation. ROBERTS stated that, although unable to offer any specific information or documentation, he and other lobbyists believe that BROWN enjoys a unique relationship with the hierarchy of the Democratic party including recently retired Chairman of the Democratic Central Committee and Los Angeles based attorney CHARLES MANATT. Additionally, ROBERTS stated that BROWN has befriended Governor EDMUND BROWN, JR.'s cabinet member DONALD BURNS who recently stepped down as the head of the State's Business and Transportation Department and it appears that he is capitalizing on BURNS' friendship in order to secure many of the more important and influential clients. Mr. ROBERTS stated

Interviewed on 6/14/77 at Sacramento, California File # Los Angeles 183-250
183-169

by SA JOHN F. MULLIGAN and
SA NORBERT R. LINKER/NRL/lkp Date dictated 6/20/77

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that with the passage of the Political Reform Act of 1974, which became effective January 1, 1975, the role of the lobbyist in Sacramento was appreciably curtailed. He advised that heretofore lobbyists were permitted to transmit political campaign contributions from their clients to legislators whom they were wooing for support on legislation favorable to the clients. Additionally, he explained that the lobbyists accountability for activity in this area was not as closely scrutinized as it is at this time and, for that reason, certain liberties were taken which they can no longer risk. He advised that DONALD KENT BROWN was one of several lobbyists who were known to distribute large sums of monies to legislators for their respective campaigns prior to the Political Reform Act and suspects that BROWN continues to direct or perhaps transmit monies, although against the law at the present time. ROBERTS offered that this may be one of the reasons why BROWN is currently ranked among the more successful lobbyists at this time.

Mr. ROBERTS advised that regrettably both parties, but most particularly the Democratic party in the State of California, have operated "slush funds" under the guise of accounts known as the Democratic Assembly Fund. He stated that these monies were gathered in the form of political contributions from many major business concerns throughout the State who were in need of favorable legislation from the majority party in power. Mr. ROBERTS suggested that a close examination of the aforementioned slush funds may reveal the misapplication of monies which go directly to leading party figures many of whom are not involved in re-election campaigns.

ROBERTS then offered that he and other legitimate and well respected lobbyists are aware that there are certain leading State Senators who are unhesitant in the use of subtle extortion from lobbyists and their clients.

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He explained that in many cases the subtle extortion occurs under the guise of tickets for fund raisers which frequently cost as much as \$1,000 per ticket. He stated that the particular Senators to whom he refers, namely Senator RALPH C. DILLS and Senator ALFRED H. SONG, or their Administrative Assistants, will contact a particular lobbyist and/or their governmental liaison officer at the offices of the lobbyist's client and suggest the need for their participation in a fund raiser or campaign re-election. Mr. ROBERTS stated that in either case, be it the lobbyist who is being solicited or the client himself, they are aware that should they decline to purchase upwards of \$5,000 or more in tickets for the particular needs of Senators DILLS or SONG they run the serious risk of having their legislation defeated in subcommittee hearings at the Senate level of the State government. He advised that Senator DILLS and Senator SONG have long capitalized on this technique and have gathered thousands of dollars through this approach. ROBERTS stated that in the case of Senator DILLS, he has frequently directly approached lobbyists for monies contrary to the Political Reform Act of 1974. Additionally, he advised that Senator DILLS' Administrative Assistant, one DICK FLOYD, who is known as a heavy drinker in Sacramento political circles; frequently makes the approach to lobbyists and/or their clients in behalf of DILLS. He suggested that if Mr. FLOYD were contacted under the right set of circumstances and felt that his position was threatened by illegal efforts on his part to solicit monies for DILLS, he might extend his full cooperation regarding the number of payoffs which DILLS has received over the years in office.

ROBERTS offered as an illustration of DILLS' brashness in soliciting monies that many people engaged in business activities in the State have indicated to he and others that when in contact with DILLS concerning their needed legislation, DILLS has unhesitatingly informed them that he would be willing to move in their favor on legislation providing certain monies were made available.

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ROBERTS stated that he strongly suggests that the FBI scrutinize the bills which Senator DILLS introduces and in the majority of cases where that legislation would favorably affect a given trade association or individual business, the chances are extremely good that he received some type of remuneration in the form of a political payoff or campaign "contribution."

ROBERTS advised that fellow lobbyist GERSON RIBNICK is known to be very closely associated with Senator DILLS and suspects that RIBNICK's clients, among whom are included 46 specialized business associations, have regularly paid DILLS requested or unsolicited monies in order to move favorable legislation in behalf of his clients. ROBERTS offered that RIBNICK currently has a bill before the State Assembly commonly referred to as the Subcontractors Bill of Rights, SB 630,1,2,3,4, which may have had the backing of DILLS and if supported by DILLS will net him a certain sum of remuneration, possibly in the form of \$5,000 or \$10,000 worth of "fund raiser dinner" tickets which is often the ploy used by DILLS and others in receiving their payoffs from lobbyists and their clients for whom they move legislation favorable to them. ROBERTS further offered that Senator DILLS' wife is an Oriental who is understood to live extravagantly and possibly beyond the financial means of DILLS. He stated that DILLS' wife's brother has been on the legislative payroll as a Sergeant at Arms which he considers a political patronage type job.

ROBERTS then advised that in his judgment the Federal Bureau of Investigation (FBI) should closely scrutinize State Senator ALFRED H. SONG's activities in the same manner in which he referred the Agents to Senator DILLS. He explained that SONG has the same unenviable reputation of extorting monies via lobbyists representing clients who would be favorably or adversely affected by legislation before the Senate and particularly SONG. He stated that Senator SONG, although relatively inactive in subtle extortions of monies for "fund raisers"

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from lobbyists and their clients during the past year, has had an extremely bad reputation in this type of activity over his tenure as a State Senator. ROBERTS stated that fellow lobbyist ROBERT J. BECKUS has bragged to fellow lobbyists and presumably others that he allegedly "owns" SONG, presumably as the result of payoffs which have been made to SONG at SONG's request over his years in office as a State Senator. ROBERTS again suggested that where SONG appears to be making a concerted effort to move legislation in behalf of a given industry or association of business types, the strong possibility exists that prior to his movement in their behalf they agreed to make available sums of money in the forms of political contributions and/or "fund raiser" dinner tickets in amounts of \$5,000 or more in order to get SONG's support.

The conversation was then turned by ROBERTS to the alleged influence of organized unions, or organized criminal elements, upon the State legislative bodies. ROBERTS stated that in his judgment the unions operating within the State of California are no longer a force to be reckoned with by the two major political parties in that the leadership of those unions can no longer dictate to their membership whom they should vote for as a block.

In this connection, ROBERTS offered that corrupt union activities continue to occur to the present time in that threats and intimidation are regularly made to contractors and subcontractors by union hierarchy who are seeking payoffs to insure labor peace. ROBERTS stated that he was speaking authoritatively on this subject as several of his clients are major building contractors and associations within the State of California.

To illustrate his point, ROBERTS cited a situation that he was personally familiar with which occurred between 1972 and 1973 when California State Highway I-5 was then under construction. He advised that a close friend, associate, and client, JACK MATICH, the owner of the

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Matich Construction Company, believed based in Riverside, California, was one of the prime contractors of the construction of I-5. He advised that construction unions, particularly in the Fresno, California, area perpetrated numerous acts of sabotage on equipment owned by the Matich Construction Company and other contractors in an effort to convince the owners that they should make payoffs to high ranking construction union officials in order to insure labor peace.

ROBERTS stated that on one occasion he attended a meeting with MATICH and other contractors on the job site during the construction of I-5 and, due to the hot weather at the time, all of the executives of the construction companies took off their coats. He advised that he observed that all of the individuals, whom he approximated to number 20, were carrying weapons for their self-protection.

ROBERTS stated that JACK MATICH, a former President of the National Association of Contractors, undoubtedly was intimidated and threatened by unknown union officials to make payoffs, particularly while construction was going forward in the Fresno, California, area and, in his judgment, union difficulties became strained when he refused. ROBERTS suggested that MATICH be interviewed for information which he is positive he possesses regarding corrupt construction union officials operating locals in the State of California and, further, feels that he can refer the FBI to contractors and subcontractors who have made payoffs in order to insure that their contracts remain in effect during a major construction project.

ROBERTS further advised that it was his understanding that alleged Mafia boss JIMMY "THE WEASEL" FRATIANNO has been engaged in the extortion and loansharking of considerable amounts of monies to the owners of small dump truck companies in the San Francisco, California, area. ROBERTS stated

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that it is his understanding that truck drivers interested in securing their own small companies and equipment have gone to FRATIANNO for loans on which he attaches exorbitant interest rates that ultimately cost them double or three times the cost of the vehicles which they acquire. ROBERTS suggested that if the FBI is not aware of FRATIANNO's involvement in the shylocking of monies to dump truck drivers, it behooves the FBI to make inquiries as they will undoubtedly come upon individual truck owners who have fallen victim to this activity by FRATIANNO and his associates. ROBERTS stated that it is his understanding that FRATIANNO's activities in the dump truck business continues to the present time.

ROBERTS was then questioned as to his familiarity with the operation of the State Legislative Counsel.

ROBERTS stated that the Legislative Counsel consists of a group of State retained attorneys, legal advisors, and secretarial staff which are available to State Legislators for legal advice on their proposed legislation and the regulations to which they must adhere to in the conduct of their State business and political campaign. ROBERTS stated that the Legislative Counsel is considered a "rubber stamp" in that it serves the State Legislators and, in most instances, offers legal opinions which the Legislators themselves are actually seeking. ROBERTS stated that GEORGE MURPHY, the Chief Legislative Counsel, has just recently retired but prior to leaving office was considered very accommodating to elected officials seeking his department's advice on legislative and political campaign matters.

ROBERTS was then asked whether he was personally familiar with a Democratic Assembly Fund which has come to the attention of the FBI during the course of an investigation. ROBERTS stated that the Democratic Assembly Fund is in reality a "slush fund" which is a repository for monies made available by contributors and in certain instances securely elected Democratic politicians for

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utilization in the campaigns of Democrats where their races appear close against their Republican opponents. ROBERTS stated that it is his understanding that the monies which are doled out from the Democratic Assembly Fund during an election campaign are actually distributed by the Speaker of the State Assembly providing that in that particular year he is a Democrat.

ROBERTS advised that the interview with the FBI has enlightened him as to the various areas of investigation which are being probed at this time. ROBERTS offered that he feels confident that he can refer the FBI to other lobbyists and honest politicians who may be willing to come forward with information regarding the corrupt political practices of a small but extremely important nucleus of State Senators and Assemblymen who, in his judgment, are corrupt. ROBERTS stated that he would immediately contact the FBI on receipt of any information along the areas discussed that date.

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CONTACT WITH U.S. ATTORNEY'S OFFICES
LOS ANGELES AND SACRAMENTO

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On April 20, 1977, SA NORBERT R. LINKER contacted AUSA WILLIAM JOHN RATHJE, Los Angeles, at which time RATHJE was furnished a copy of the April 13, 1977, interview of ROBERT MORETTI for his examination and determination of possible federal violations contained therein.

During this contact, RATHJE was referred to California Penal Code (CPC) Section 85 which carries a penalty of one to ten years for giving or offering bribes to members of the State Legislature.

RATHJE was further referred to California State Government Code Section 9909, requiring a notification of bribe offers by elected State officials to appropriate agencies, which was repealed in 1974.

RATHJE advised he would review the MORETTI interview, research the State Government Code, and Penal Code, to determine whether the allegations offered by MORETTI constitute violations of the Racketeer Influence and Corrupt Organizations (RICO) statute.

On April 26, 1977, AUSA RATHJE advised SA LINKER that he had completed his legal research of the MORETTI interview and had concluded the bribe offers alleged by MORETTI, particularly the 1972 and 1973 offers of \$100,000 cash by lobbyists representing the Independent Mortgage Brokers Association, constitute violations of the RICO statute.

AUSA RATHJE stated in his opinion, venue in this RICO matter is in Sacramento as the bribes were offered to MORETTI in that city.

On September 22 and 23, 1977, extensive discussions were held by SA MULLIGAN and SA LINKER with AUSA THOMAS T. COURIS and USA DWAYNE KEYES at Sacramento. During this conversation, it became obvious that a great deal of investigative work would be necessary to bring this case and others which would logically grow out of scheduled testimony of ROBERT MORETTI, to be taken by the Federal Grand Jury on September 28, 1977, to a logical conclusion.

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AUSA COURIS also advised that a review of CPC Sections 85 and 86 with reference to bribe offers and acceptance of bribes would constitute violations of the RICO statute when there are two or more bribe offers.

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FEDERAL BUREAU OF INVESTIGATION

ALL INFORMATION CONTAINED

HEREIN IS UNCLASSIFIED

Date of transcription 11/3/77DATE 5/6/96 BY SSA9803RDD/8
405,193

[redacted] was advised of the nature of the interview and furnished the following information:

[redacted]

[redacted]

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From [redacted] he was never approached by any lobbyist or client of a lobbyist and offered any money or anything else in return for his vote on any legislation. He recalled that on one occasion five or six years ago, an unknown older man came into his office and asked him to carry a piece of legislation for him. He thought it concerned food processing, and if he would carry this legislation, this individual offered him a partnership in the business. He stated he thought the man was a kook and told him to leave. The individual had no credentials as a lobbyist and he has no idea who he was. The man indicated he was from Arizona. He never saw him again.

He was asked if he knew [redacted] He advised that he knew [redacted] however did not have a close relationship with him. He explained that [redacted]

[redacted] He went on to say that while many times their committees handled the same legislation, he was not close to [redacted] due to age differences and legislative biases.

He was not aware of [redacted] ever sitting on legislation in order to fill his campaign coffers. He had heard

DO NOT DESTROY SERIAL

FOIA/PA

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FOR TO

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at

California

File #

SC 183-112

SA WILLIAM LOGAN CURTIS *WLC* *smd*

Date dictated

11/3/77

Ronald Reagan-3258

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; and its contents are not to be distributed outside your agency.

rumors to this effect but had no specific information that this was true.

He was asked if he recalled Senate Bill (SB) 243 [redacted] He was shown a copy of the bill and replied he did recall it, however did not remember who benefitted from the bill. He thought that [redacted]

He had no information that [redacted] was ever offered or accepted any bribes in return for political favors.

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He was questioned concerning his relationship with [redacted] He advised he knew [redacted] but was not particularly close to him. He advised that two or three years ago, [redacted] came to him on [redacted] [redacted] handed him a brochure, and stated, Here's something I'm interested in, look at it and see if you are interested. He looked at the brochure, which was about a [redacted] [redacted] and told [redacted] he had always been interested in [redacted] [redacted] since [redacted] told him he could buy in for [redacted] dollars. Some time later, he told [redacted] he did not think he could raise the money. He remembered that [redacted] told him there were to be four partners in the [redacted] which was operational in the [redacted] area. [redacted] did not tell him who the other two partners were.

He subsequently learned that as the owner of a [redacted] [redacted] and also as an elected official, it would be illegal for [redacted]

[redacted] This, coupled with his inability to raise the money, led him ultimately to tell [redacted] he was not interested and he thought no more about it.

Some time later, a newsman contacted him about him being in business with [redacted] a lobbyist, and a fourth man whose name he does not recall. He also learned from the newsman that a Declaration of Intention had been filed with the federal government stating [redacted] in a [redacted] with these same men. He knew nothing about this filing and contacted [redacted] who stated the declaration had been filed by the [redacted] and was standard procedure.

He never proceeded any further with the [redacted] never put up any money, and never authorized anyone to use his name.

He has no information to the effect that [redacted] has ever accepted bribes, gifts, trips, etc., in return for political favors. He knows [redacted] has had marital problems, drinks, and has the reputation of a swinger, but could offer nothing specific. He advised that [redacted] knows [redacted] quite well.

He was asked whether [redacted] represented [redacted] during the time period when the [redacted] issue was being debated.

He replied [redacted] did represent [redacted] [redacted] during this time.

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He was asked if [redacted] exerted any undue influence or bribed any of the legislators in order to obtain a favorable vote for his client.

He replied that he was unaware of [redacted] exerting any influence or bribing any of the legislators.

He explained that there has been much criticism of the [redacted] and he feels it is unwarranted. [redacted]

[redacted] He then began an investigation to determine the feasibility of [redacted] or [redacted] was pushing for [redacted] at a cost of [redacted] dollars plus and then [redacted] for another [redacted] dollars. [redacted] approached him to request the [redacted] [redacted] He told [redacted] he was not going to do anything until he had studied the matter. He and [redacted] did not get on too well after that.

He went to [redacted] [redacted] and other places to obtain expertise necessary to make a decision. In discussion with [redacted] handling the



At this point in time, the [redacted] was advertised in all the trade journals. Approximately [redacted] responses were received. These responses were reviewed by [redacted] [redacted] appointed by then Governor RONALD REAGAN who advised that most of those who had responded were not qualified to do the work. [redacted] pared the list to ten and then to four.

[redacted] did not meet with any of the four finalists in order to preclude anyone from saying he had been involved in any deal. Each member of the committee was furnished with written criteria by which to grade the four finalists. Those finalists in turn were advised of what the committee would be considering.

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As the hearing approached, the four finalists began lobbying activities. He recalled officials of [redacted] one of the finalists, tried to see him, but he refused. Their lobbyist, [redacted] was active. He thought one of the other finalists was [redacted] (phonetic) but did not remember the last company. [redacted] represented [redacted] [redacted] and actively lobbied. He knew of no improprieties in this matter.

Following the hearings, [redacted] was head and shoulders over the other three. In the area of [redacted] expertise and positive action, [redacted] had a proposed program where the others did not. He advised there was no wrongdoing involved and no money was paid to anyone, to his knowledge, in order to insure [redacted] was awarded this contract.

SC 183-112

He was asked if he knew of any Assemblymen or Senators who were considered to be approachable with regard to accepting monies under the table. He stated that he had heard rumors that [redacted] could be approached but reiterated it was only rumor.

He was asked if he knew of any lobbyists who had offered bribes to any elected officials. He replied that he did not.

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He was asked if he knew [redacted] and replied he had met him but did not know him well. He stated that [redacted] could affect legislation through [redacted]. He denied that [redacted] had any influence in [redacted].

He was asked if he was aware of the hearings [redacted] conducted on the [redacted] controversy. He knew about them but was unaware of their short duration. He has never discussed this with [redacted]. He is unaware of any payoff or political pressure exerted to stop these hearings. He advised that the only political pressure that could be exerted would have to come from the [redacted] and he was close to [redacted] and knew of no such pressure.

He was asked about [redacted] and stated he had no information to indicate [redacted] had ever accepted money illegally or even been approached.

He was asked if he was familiar with "cinch bills." He asked if that was a bill that was sure of passage. He was advised that these bills have been described as those controversial bills guaranteed to obtain campaign contributions from proponents or opponents. He stated he was unaware of this term, however then discussed [redacted]

SC 183-112

He mentioned that he had gone to [redacted] to study
[redacted] and that [redacted] had gone to [redacted]
[redacted] regarding [redacted]

He was asked why [redacted] campaigned for [redacted]
[redacted] in [redacted] and who paid his expenses. He
said he did not know since [redacted] never discussed it with him.

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 11/1/77DATE 5/6/96 BY SSA9803RDD/E
405.92

[redacted] telephonically contacted SA NORBERT R. LINKER at the Sacramento Office of the FBI to advise that she had just placed several documents pertaining to [redacted] in the mail for the review and use of the FBI in its on-going investigation. [redacted] stated some of the documents that she has forwarded include documentation regarding [redacted] involvement with [redacted] doing business as [redacted] which reflects [redacted] as a [redacted] % owner of that company. She advised documents also forwarded will reflect the names of [redacted] partners in the aforementioned [redacted] as [redacted] and friend of [redacted] and [redacted] businessman [redacted] as well as [redacted] whom she previously had identified as the [redacted] which [redacted] was responsible for the [redacted]

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Additionally, [redacted] advised among the documents forwarded is a letter directed to her by [redacted] dated November 22, 1975, in which he makes reference to [redacted]

[redacted] further advised she is incorporating documents which pertain to a [redacted] which she was under the impression had been [redacted]

[redacted] Also forwarded is an itemized listing of [redacted] which she contends was at [redacted] at the time of [redacted] She stated included among those items or [redacted] listed by her are the [redacted] and [redacted] which she has previously referred to as items [redacted] advised included is a letter directed to [redacted] from the [redacted] relative to the sale of [redacted] which as of April 1, 1976, would represent a price of [redacted]

Interviewed on 10/31/77 at [redacted] File # SC 183-115-40by SA NORBERT R. LINKER:smc Date dictated 11/1/77

Ronald Reagan-3264

[redacted] stated she would assume that the documents which she made reference to would arrive at the FBI Office, Sacramento, by November 1, 1977.

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[redacted] was then questioned concerning certain aspects of information which she made available during previous interviews. Specifically, [redacted] was questioned as to her understanding of the relationship between [redacted] and [redacted] stated according to information which she received from [redacted] [redacted] was initially [redacted] as a result of efforts exerted by [redacted] and an unrecalled associate of [redacted] who at one time served as former Governor RONALD REAGAN's [redacted] She stated as her memory served her, [redacted] a friend of [redacted] [redacted] after which [redacted] exerted certain influences which led to [redacted]

[redacted] stated it was further understood by her that [redacted] is [redacted] and his friendship with [redacted] goes back several years, and the possibility exists that [redacted] may be acquainted with [redacted]

[redacted] was then asked if she could clarify the relationship that existed between [redacted] and [redacted] inasmuch as she alleges that [redacted]

[redacted] stated it is her understanding through conversations she has had with [redacted] that [redacted]

[redacted] She stated it is also her understanding that some time subsequent to the [redacted] [redacted] and the aforementioned [redacted]

exerted influences to [REDACTED]

[REDACTED] then offered that at the time of [REDACTED] maintained a checking and savings account at the [REDACTED] but was also understood to have one or more bank accounts in [REDACTED] the banks of which are unknown to her.

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[REDACTED] was then asked whether she could better clarify her understanding of the relationship which existed between the [REDACTED] and [REDACTED] inasmuch as she had previously mentioned that [REDACTED] had either [REDACTED] or was [REDACTED]

[REDACTED] stated although she did not attend [REDACTED] to which she was referred, she was positive that the date of the affair was [REDACTED] at the residence of [REDACTED] in [REDACTED] who had either [REDACTED] with [REDACTED] in the operation of a [REDACTED] in that area. [REDACTED]

[REDACTED] was unable to attend the affair but stated through conversations with [REDACTED] she came to learn that [REDACTED] was definitely in attendance and theorized that [REDACTED]

[REDACTED] stated she will continue efforts to locate and transmit other documents relative to [REDACTED] and his suspected illegal activities during [REDACTED]

SC 183-142-19

SEARCHED	INDEXED <u>5</u>
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FBI - SACRAMENTO	
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Ronald Reagan-3267

FEDERAL BUREAU OF INVESTIGATION

Date of transcription 4/3/78

5696 SSA9803RDD/EL
405, 193
[redacted] was interviewed at his office located at [redacted] in San Francisco. He provided the following information:

In May of 1968, he was appointed to the position of [redacted] by the then California Governor RONALD REAGAN. [redacted] served in that capacity until the early months of 1976, shortly after Governor BROWN assumed office.

During his tenure [redacted] In the latter months of 1974, a sub-committee was appointed to determine [redacted]

Although [redacted] was, himself, not a member of this sub-committee, and does not recall attending any meetings, he does recall a few of the members on that committee. They are as follows:

[redacted]

[redacted]

[redacted]

[redacted] employed by [redacted] acting as representative for [redacted] industry.

There were also some three to four others who came from Housing Community Development.

[redacted] was unaware as to how the committee members were named other than some persons in the state administration had appointed them.

When asked if he was aware of [redacted]

Interviewed on 3/20/78 at San Francisco, Calif. File # SF 183-269-16

by SA JAMES D. L. WHALEY *[Signature]* sdc Date dictated 3/23/78

SF 183-269
JDW/sdc

requesting the appointment of any person [] vaguely recalls [] name had come up in that context, but [] could not remember the details with any specificity.

When asked regarding [] position with the sub-committee, [] and others were at that time somewhat surprised that [] employee would be on the committee because of the possible conflict of interest. [] position was based upon his being a representative of the [] industry. [] in turn, was bringing his own expertise and that of [] to the sub-committee on technical questions regarding []

[] had heard what he emphasized to be rumors regarding [] being the guiding force on the sub-committee.

[] had no knowledge and had heard no rumors regarding a [] in order to conform with the standards that were ultimately adopted by the sub-committee.

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[] balked at enforcing the [] requirements adopted by the committee. []
[]
[] He is unaware of the current status of the [] requirement.

[] advised that [] had been limited []
[]
He was unaware of any expert in the area who was prevented from expressing his views to the sub-committee as to limitations of []

When asked if he had any contact with [] office, [] advised that the only contact was in the form of a letter (contents unrecalled) that he had received at about the time he had balked over the []

[] suggested that an [] be interviewed. [] while not a committee member, attended all the meetings as [] He is very knowledgeable regarding the background of []

SF 183-269
JDW/sdc

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[redacted] also suggested that [redacted] be contacted and interviewed as [redacted] is quite knowledgeable regarding the background of [redacted] was. at that time, the [redacted] for the [redacted] [redacted] He is now employed by [redacted] in [redacted] telephone number [redacted]

[redacted] also advised that during this time span, [redacted] was [redacted]

FEDERAL BUREAU OF INVESTIGATION
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FEDERAL BUREAU OF INVESTIGATION

1

Date of transcription 10/10/78

5/6/96

SSA #03 RDM/8
HAS #2

[redacted] was interviewed at his place of business, [redacted] Pasadena, California, 91101, telephone number [redacted] [redacted] does business as [redacted] The company is involved in [redacted]

[redacted] for [redacted] The company has also been involved in the [redacted] and is currently concentrated in providing [redacted] concerning [redacted]

[redacted] resides at [redacted] Arcadia, California. He is a graduate of [redacted] and also [redacted]

While attending [redacted] became acquainted with [redacted] During the administration of California Governor RONALD REAGAN, the Governor appointed [redacted] as [redacted] [redacted] apparently recalled that [redacted] lived in Southern California and frequently contacted [redacted] concerning possible recommendations for various appointed positions to be filled within the REAGAN administration. When [redacted] in [redacted] recommended to the REAGAN administration that [redacted] be appointed as [redacted]

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[redacted] He was in fact appointed to that position by Governor RONALD REAGAN and assumed the duties of that position on [redacted]

[redacted] served as [redacted] from [redacted] through [redacted] During the period of time that [redacted] served on [redacted] he met with [redacted] at least [redacted] One of these meetings would be held in [redacted] while the other [redacted] meeting would usually be held in [redacted] times per year meetings would be held in the area of [redacted]

Interviewed on 10/6/78 at Pasadena, California File # Los Angeles 183-568

by SA JOSEPH T. SHEEHAN/cks/clt Date dictated 10/10/78

[REDACTED]

[REDACTED]
[REDACTED] During the period of their
association on [REDACTED] often
discussed various projects and/or topics with [REDACTED]
prior to bringing the matter up before [REDACTED]
In some cases it was obvious to [REDACTED] that [REDACTED]
was attempting to "lobby" for [REDACTED] "on some issues."
With regard to [REDACTED] did not conduct
any type of "lobbying campaign" to [REDACTED] or any other
member of [REDACTED] is of the
opinion that most of the members of [REDACTED]

[REDACTED]

[redacted] has never been involved in a business relationship with anyone associated with [redacted] [redacted] or [redacted]. He has never received any monies or gifts or had any financial dealing with anyone associated with those organizations. He has not held an elected position and has been appointed only to [redacted]

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[redacted] does not recall specifically hearing any discussion after [redacted] vote concerning the possibility of someone being "paid off" to influence their vote. Quite often however when a vote went against the "liberals on the staff or [redacted] comments would often be heard concerning someone obviously paying off the more conservative members of [redacted] for their vote. This practice had been used quite often by [redacted] to frighten not only [redacted] but also politicians who might have had an interest in a particular issue.

FEDERAL BUREAU OF INVESTIGATION
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FOI/PA# 1089424-2

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1 G. A. Bronson
Post Office Box 588
2 Sacramento, California 95803
3 For the Plaintiff
4

ORIGINAL
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MAY 12 1978

CLERK OF U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
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405/H3

8 UNITED STATES DISTRICT COURT

9 FOR THE

10 EASTERN DISTRICT OF CALIFORNIA

11
12 GEORGE A. BRONSON,
13 Plaintiff,
14 vs.

No. ~~8-76-447-PCW~~

AMENDED COMPLAINT

15 THE UNITED STATES OF AMERICA;
GOVERNOR EDMUND G. BROWN, Jr.;
16 FEDERAL BUREAU OF INVESTIGATION
AND DIRECTORS L.P. GRAY, CLARENCE
17 KELLEY, WILLIAM RUCKELSHAUS; U.S.
DEPT. OF JUSTICE, U.S. ATTORNEYS
18 DWAYNE KEYES, DONALD HELLER; U.S.
TREASURY DEPT., SECRET SERVICE;
19 FEDERAL PROTECTIVE SERVICE/GSA,
DIRECTOR, OFFICERS CLEMONS (BADGE
20 3327), JAMES CHASTAINE, CLARENCE
L. SNELSON; LUV SECURITY SERVICE,
21 OFFICERS GREER AND W.W. SMITH;
LEON JAWORSKI; GEN. ALEXANDER
22 HAIG; STATE OF CALIFORNIA, ATTOR-
NEY GENERAL EVELLE J. YOUNGER,
23 STATE CONTROLLER HOUSTON I. FLOUR-
NOY, MARC POCHE, CALIFORNIA HIGH-
24 WAY PATROL, COMMISSIONER GLENDON
B. CRAIG, STATE POLICE, CHIEF GUY
25 R. OATES, OFFICERS L.D. SHERWOOD
AND S.W. WESTON, RONALD REAGAN;
26 LAW ENFORCEMENT ASSISTANCE ADMIN.,
U.S. ARMY; WINCHESTER/OLIN CORP.,
27 REMINGTON/DUPONT CO.; COLT INDUS.;
SACRAMENTO COUNTY, SHERIFF DUANE
28 LOWE, D.A. JOHN PRICE; CITY OF
SACRAMENTO, POLICE DEPT. CHIEF
29 W.J. KINNEY; NRA; IACP; NAT'L
SHERIFFS ASSN; AT&T, PACIFIC TELE-
30 PHONE; WESTERN UNION; SMUD; L.A.
COUNTY, SHERIFF PITCHESS; CITY OF
31 L.A., MAYOR T. BRADLEY, CHIEF ED.
DAVIS; and JOHN DOES ONE THROUGH
32 ONE HUNDRED,
Defendants.

(CONSPIRACIES AND ACTS
IN VIOLATION OF
CONSTITUTIONAL RIGHTS
AND CIVIL RIGHTS,
ANTI-TRUST LAWS;
UNLAWFUL INTERFERENCE
WITH BUSINESS AND TRADE
RELATIONS; ASSAULT, BATTERY,
MAYHEM AND ATTEMPTED MURDER,
MISUSE OF POLICE POWER,
FRAUD, LIBEL, SLANDER,
ILLEGAL TELEPHONE INTER-
FERENCE AND WIRETAPS,
UNLAWFUL SEIZURE AND
IMPRISONMENT, CONSPIRACY
TO OBSTRUCT JUSTICE;
DAMAGE TO BUSINESS PROPERTY,
INCOME, REPUTATION, TRADE;
CONSPIRACY IN THE
COMMISSION OF FEDERAL
FUNDING BLACKMAIL.)

10-5-1

SEARCHED _____	INDEXED _____
SERIALIZED _____	FILED _____
JUN 13 1978	
FBI - SACRAMENTO	

McCrystle

Ronald Reagan-2746

1 Plaintiff George A. Bronson, in propria persona, files this
2 AMENDED COMPLAINT as a matter of course before service of a re-
3 sponsive pleading to his original complaint. F.R.Civ.P. Rule 15.

4 Plaintiff's original complaint was filed with the Clerk of
5 the Court, United States District Court for the Eastern District
6 of California on August 20, 1976. Because of related case mater-
7 ial activity in the Superior Court in and for the County of Sac-
8 ramento, plaintiff has received continuances from this Court on
9 October 31, 1977 and January 3, 1978, pursuant to Local Rule 117.

10 JURISDICTION

11 Plaintiff complains against defendants, and each of them,
12 and alleges:

13 I

14 Plaintiff, GEORGE A. BRONSON, is President of Anchor Inter-
15 national, Inc., a corporation incorporated under the laws of the
16 State of California, having its principal place of business in
17 the State of California; is a Yale graduate Inventor and Patent
18 Holder of Record in the United States, NATO and other allied
19 countries, and is a citizen of the State of California, whose
20 business address is Post Office Box 588, Sacramento, California
21 95803.

22 II

23 This Court has jurisdiction of this cause under and by
24 virtue of:

25 1. Title 28 of the United States Code, Section 1332, in
26 that the matter in controversy exceeds the sum of ten thousand
27 dollars (\$10,000.), exclusive of interest and costs, and is
28 between: Ronald Reagan-2747

29 (1) Citizens of different States;

30 (2) Citizens duly appointed, employed, and acting within
31 their capacities as skilled professionals, elected or appointed,
32 on behalf of the United States of America.

1 2. Title 28 of the United States Code, Sections 1331 and
2 1343, this being a suit in equity authorized by law, Title 42,
3 United States Code, Section 1983, to be commenced by any citizens
4 of the United States or other person within the jurisdiction
5 thereof to redress the deprivation under color of statute, ordin-
6 ance, regulation, custom or usage of a State of rights, privi-
7 leges, and immunities secured by the Constitution and the Laws of
8 the United States. The rights, privileges, and immunities
9 sought herein to be redressed are those secured by the First
10 Amendment, Fourth Amendment, Sixth Amendment, and the Due
11 Process and Equal Protection Clauses of the Fourteenth Amend-
12 ment to the Constitution of the United States.

13 3. Title 28 of the United States Code, Section 1343, for
14 deprivation of civil rights, including assault by police officer
15 acting under color of law, and to enjoin unconstitutional actions
16 of state officials.

17 4. Title 28 of the United States Code, Sections 1346(b),
18 2671 et seq., for damages under the Federal Tort Claims Act.

19 5. Title 28 of the United States Code, Section 1337, for
20 interference with contractual business relationships and inter-
21 state commerce.

22 6. Title 42 of the United States Code, Sections 1981, 1982,
23 right to equal rights under the law.

24 7. Title 42 of the United States Code, Sections 1983, 1985,
25 et seq., for deprivation of civil rights, and conspiracies and
26 acts to interfere with civil rights.

27 8. Federal Election Campaign Law and Act, and actions
28 thereunder, of 1971, as amended. Ronald Reagan-2748

29 9. Controversies to which the United States is a party,
30 United States Constitution, Article III, Section 2.

31 10. Title 15 of the United States Code, Sections 1,2 (Sher-
32 man Act), and Title 15, United States Code, Section 15 (Clayton

1 Act), action for treble damages.

2 11. Title 28 of the United States Code, Sections 1346(b),
3 2671 et seq., Federal Tort Claims Act, as hereinafter more fully
4 appears in plaintiff's causes of action, ONE through SEVENTY-
5 FIVE, for civil actions against the United States within six (6)
6 years of right of action accruing, and for tort claims against
7 the United States within two (2) years of right of action accru-
8 ing.

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29 Ronald Reagan-2749
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2 12. Title 15 of the United States Code, Section 26, action
3 for injunction under the Sherman Act.

4 13. Title 42, United States Code, Section 1986, action for
5 failure to prevent conspiracy to interfere with civil rights
6 (28 USC §1343).

7 III

8 The true names and capacities of defendants JOHN DOES ONE
9 THROUGH ONE HUNDRED are at this time unknown to plaintiff who
10 sues said defendants by such fictitious names. Plaintiff is in-
11 formed and believes and thereon alleges that the JOHN DOES ONE
12 THROUGH ONE HUNDRED defendants are responsible in some
13 manner for the occurrences herein alleged and proximately
14 thereby caused injuries and damages to plaintiff as herein alleged.

15 IV

16 Each and all of the acts of defendants alleged herein were
17 done by defendants acting under the color and pretense of author-
18 ity, statutes, Federal law, State law, regulations, and under the
19 authority of their offices.

20 V

21 Defendants are, and at all times herein mentioned were, and
22 to the best of plaintiff's knowledge are now duly appointed, em-
23 ployed, and acting within their capacities as skilled profession-
24 als, elected or appointed, within the Federal Government, State
25 of California Government, County of Sacramento Government, City
26 of Sacramento Government, the Department of Defense, the United
27 States Army, Federal Bureau of Investigation, Federal Protective
28 Service, or public corporations, or other businesses, organized
29 and existing under the laws of California or with place of busi-
30 ness addresses in this State in Sacramento County.

Ronald Reagan-2750

31 VI

32 Acts complained of herein took place in Sacramento County, CA
and elsewhere.

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1 of the privileges and immunities guaranteed to plaintiff by Amend-
2 ments I, IV, VI, VII, and XIV to the United States Constitution.

3 IV

4 Plaintiff BRONSON is a citizen of the United States whose
5 business address is Post Office Box 588, Sacramento, California
6 95303, the United States Post Office Building, 801 I Street (8th
7 and I Streets), Sacramento, California.

8 V

9 Defendants are:

10 1. Def. FEDERAL PROTECTIVE SERVICE of the UNITED STATES (GSA)
11 GENERAL SERVICES ADMINISTRATION. Headquarters of the GSA are
12 Washington, D.C. Local headquarters of the FEDERAL PROTECTIVE
13 SERVICE (FPS) is 650 Capitol Mall, Sacramento, California.

14 2. Defs. OFFICERS CLEMONS (BADGE 3327), JAMES CHASTAINE,
15 and CLARENCE SNELSON are uniformed agents and employees of the
16 Sacramento FEDERAL PROTECTIVE SERVICE.

17 3. Defs. OFFICERS GREER and W.W. SMITH (BADGE 30), uniformed
18 employees of LUV SECURITY SERVICE, Sacramento, California.

19 4. Def. LUV SECURITY SERVICE, Sacramento, California, by
20 attorney Michael Sands, Sacramento, California, is under con-
21 tract to the FEDERAL PROTECTIVE SERVICE to performs services as
22 contracted.

23 5. Defs. FEDERAL BUREAU OF INVESTIGATION and DIRECTOR CLAR-
24 ENCE KELLEY are headquartered in Washington, D.C., with local
25 address of 2800 Cottage Way, Sacramento, California.

26 6. Def. "VICTOR MARTINEZ".

Ronald Reagan-2752

27 VI -A

28 Plaintiff does not know the true names and capacities of de-
29 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
30 therefore sues these defendants, and each of them, by such ficti-
31 tious names for damages caused and proximately caused to plaintiff.

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VI -B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV to the Constitution of the United States.

VI -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, herein-after and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

V

That on August 22, 1975, in the County of Sacramento, State of California, in the United States Post Office, 801 "I" Street, Sacramento, California, defendants FPS OFFICERS CHASTAINE AND CLEMONS and LUV OFFICER GREER, under color of authority and pretense of law, and armed with deadly weapons, and each of them, maliciously, wantonly, willfully, recklessly, wrongfully, viciously, and violently, without cause or provocation, attacked, beat, strangled, handcuffed, illegally searched and seized, falsely arrested, falsely imprisoned, restrained, and struck plaintiff in and about the face and head and other parts of his body, and made other multiple physical abuses and injuries to plaintiff which required plaintiff to go to the hospital for care and treatment, violating the securities, privileges and immunities guaranteed to plaintiff under the I, IV, V, VI, VII, and XIV Amendments to the Constitution of the United States.

VI

That on August 22, 1975, plaintiff's right of privacy was wrongfully, unlawfully, conspiratorially and maliciously abused in the above-mentioned wrongful acts and conspiracies of defendants, and each of them, by the attacks, beatings, strangulations, handcuffing, illegal search and seizure, false arrest, false imprisonment, restraint, and striking of plaintiff in and about the face and head and other parts of plaintiff's body.

Ronald Reagan-2754
VII

The above-mentioned wrongful and conspiratorial and malicious acts constituted an invasion of plaintiff's right of privacy in that plaintiff in no way consented to or authorized the unreasonable search, seizure, beating, handcuffing, strangulation, false imprisonment, and other restraints, nor did plaintiff submit himself voluntarily to the control and custody of the defendants, nor did plaintiff authorize any of these wrongful acts against his

1 person, all of these wrongful acts being done willfully, mali-
2 ciously, intentionally, and negligently against plaintiff by
3 force from three (3) federal officers' beating plaintiff.

4 VIII

5 The above-mentioned acts and conduct of the defendants, and
6 each of them, claimed by them to be under federal authority, con-
7 stituted an abuse of their federal authority and was not within
8 their scope of employment as federal agents in that their acts
9 and conduct were not based on the exercise or performance of a
10 discretionary function or duty assumed by them as agents of the
11 FEDERAL PROTECTIVE SERVICE and were not acts and conduct done
12 pursuant to the regulations of the FEDERAL PROTECTIVE SERVICE
13 and were acts performed within the scope of defendants employment
14 BUT WITHOUT EXERCISING DUE CARE WHILE ACTING WITHIN THE SCOPE OF
15 THEIR EMPLOYMENT, and defendants, and each of them, acted in
16 fraud, corruption or malice.

17 IX

18 As a result of the above-mentioned conduct of the defendants,
19 and each of them, plaintiff was deprived of rights, privileges,
20 and immunities secured to him by the Constitution and Laws of the
21 United States in that such conduct constituted an arbitrary in-
22 trusion by defendants(s) upon the security of plaintiff's privacy
23 and body, thereby depriving plaintiff of life, liberty, and prop-
24 erty without due process of law and plaintiff is entitled to re-
25 lief under USC, Title 42, §1983.

26 X

27 That by reason of the injuries inflicted by defendants, and
28 each of them, plaintiff was wounded and has suffered bodily pain
29 and discomfort, and has suffered great pain of mind and mental
30 anguish and emotional distress.

Ronald Reagan-2755

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XI

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies, by illegally beating, strangling, handcuffing, and falsely imprisoning plaintiff.

XII

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was subjected to humiliation and indignity and suffered great mental pain and suffering, the damages and sums which shall be proved at trial.

XIII

That all of the foregoing acts were done and committed and caused by defendants, and each of them, with malice and ill will and with the intent and design of injuring and oppressing plaintiff, and in conspiracy with others, and for that reason plaintiff is entitled to and asks for punitive or exemplary damages as shall be demonstrated at trial, and as incorporated herein under DAMAGES from page 274.

XIV

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was compelled to and did expend sums for medical care and the employment of physicians and surgeons; by virtue of which plaintiff has incurred debts in amounts to be demonstrated at trial, which sums were necessary, reasonable and proper.

XV

That by reason of the injuries inflicted upon plaintiff by

1 defendants, and each of them, plaintiff will continue to suffer
2 great pain and anguish of body and mind, and earning capacity,
3 and plaintiff's injuries and damages shall be proved at trial;
4 and as incorporated herein under DAMAGES from page 274.

5 X

6 WHEREFORE, plaintiff demands judgment against defendants,
7 and each of them, and others, in the sum and costs to be demon-
8 strated at trial, and incorporated under DAMAGES on page 274, com-
9 pensatory, punitive, and such other relief deemed just and proper.

10 SECOND CAUSE OF ACTION

11 I

12 Plaintiff does hereby incorporate and adopt by reference,
13 all allegations set forth in Paragraphs I-VI, JURISDICTION, and
14 Paragraphs I-X, FIRST CAUSE OF ACTION.

15 II

16 This Court has jurisdiction under Title 42, USC, Sec. 1981
17 et seq., and violations of Due Process and Equal Protection Clauses
18 of the Fourteenth Amendment to the U.S. Constitution.

19 III

20 Plaintiff is a citizen of the United States whose business
21 address is Post Office Box 588, Sacramento, California.

22 IV

23 Plaintiff believes defendant's name of "Victor Martinez" is
24 an alias, and so sues said "Victor Martinez" as a JOHN DOE-ONE
25 THROUGH ONE HUNDRED.

Ronald Reagan-2757

26 V

27 On August 22, 1975, at 301 I Street, Sacramento, California,
28 the Federal Post Office Building at 8th and I Streets, Sacramen-
29 to, defendant "Martinez" assaulted plaintiff by wrongfully, unlaw-
30 fully, intentionally, and menacingly tracking, following, "dog-
31 ging" plaintiff Eronson inside the U.S. Post Office, after many
32 months of menacingly tracking, following, "dogging" plaintiff

1 BRONSON outside the U.S. Post Office and throughout Sacramento
2 County. Each and every time defendant "MARTINEZ" was around
3 plaintiff, plaintiff was immediately alarmed and apprehensive
4 for his safety because of "MARTINEZ"'s concealed weapon on his
5 person. Plaintiff was constantly, fearfully, and warily shifting
6 his standing, sitting, walking, or driving positions in counter
7 movement to the malicious, wanton, willful or reckless disregard
8 for plaintiff's rights exhibited by one "MARTINEZ".

9 VI

10 On August 22, 1975, in the United States Post Office, 8th
11 and I Streets, Sacramento, defendant "MARTINEZ" appeared after
12 plaintiff, and plaintiff feared for his life right in the Post
13 Office by "MARTINEZ" gestures, walk, following, watching, of
14 plaintiff. Plaintiff was so alarmed, fearful and apprehensive
15 with the wrongful behavior of "MARTINEZ" in the Federal Building,
16 that plaintiff warned defendants UNITED STATES GOVERNMENT, FEDER-
17 AL PROTECTIVE SERVICE, LUV SECURITY SERVICE, FPS OFFICERS CLEMONS
18 AND CHASTAINE, and LUV OFFICERS GREER and W.W. SMITH that plain-
19 tiff intended to place said "MARTINEZ" under citizen's arrest
20 for harassment of plaintiff in the federal building.

21 VII

22 That on August 22, 1975, defendants, and each of them, know-
23 ingly and willfully organized and caused to be organized a new
24 conspiracy and agreement among themselves, and each of them, to
25 stop plaintiff BRONSON by forcible means from placing defendant
26 "MARTINEZ" under citizens arrest, or to stop plaintiff from
27 causing an arrest warrant to be issued for one "MARTINEZ", either
28 from federal or local agencies, or exercising his privileges.

29 Ronald Reagan-2758
VIII

30 That on August 22, 1975, defendants FPS and LUV officers
31 did assault, beat, strangle, handcuff, illegally search and
32 seize, falsely arrest, falsely imprison, and make other multiple

1 without cause or provocation
2 physical abuses and injuries to plaintiff/under color of authority
3 and pretense of law, and armed with deadly weapons. Plaintiff
4 does hereby incorporate and adopt by reference all allegations
5 set forth in plaintiff's FIRST CAUSE OF ACTION, violating security
6 of his person, I, IV, VI, VII, and XIV Amendments to U.S. Constitution.

IX

7 That defendants, and each of them, did the acts and things
8 herein alleged pursuant to, and in furtherance of, the conspiracy
9 and agreement above alleged, and hereinafter and hereinbefore
10 complained of. Plaintiff was not arrested, was deprived immuni-
11 ties and privileges.

X

12 By reason of the wrongful, intentional, and malicious acts
13 of defendants, and each of them, and the fright and injuries
14 thereby caused plaintiff, plaintiff has suffered extreme and
15 severe mental anguish and physical pain, and has been injured in
16 mind and body and earning capacity, the nature and extent of which
17 shall be proved at trial, and as incorporated herein under DAMAGES
18 from page 274.

XI

19 WHEREFORE, Plaintiff demands judgment against defendants,
20 and each of them, the sum and costs of which shall be proved at
21 trial, compensatory and punitive damages, and just and proper re-
22 lief.

THIRD CAUSE OF ACTION

I

24 Plaintiff does hereby incorporate and adopt by reference,
25 all allegations of jurisdiction set forth in Paragraph I through
26 §1343,
27 VI, JURISDICTION; 28 U.S.C. §1346(b); 42 U.S.C. §1981 et seq.

II Ronald Reagan-2759

29 Plaintiff does hereby incorporate and adopt by reference,
30 all allegations set forth in all causes of action herein, herein-
31 before and hereinafter complained of, for deprivations of priv-
32 ileges and immunities, Amendments I, IV, VI, VII, XIV, under color of
law.

III -A

Plaintiff is a citizen of the United States; UNITED STATES is a party; amount in controversy exceeds ten thousand dollars.

III -B

On August 22, 1975, defendants FPS OFFICER JAMES CHASTAINE and LUV OFFICER GREER forcibly took plaintiff from the United States Post Office and forcibly took plaintiff to his business automobile parked in a private parking lot one block away. Plaintiff was menaced by said defendants, and each of the, for some time at plaintiff's business automobile. Plaintiff not only feared for his continued personal safety from a deadly weapon or fists, but feared for the personal safety of innocent by-standers as well. Defendants had no cause or provocation to so act.

IV

That by reason of said acts plaintiff was placed in great fear for his life and physical well being, and the lives and physical well being of innocent by-standers, defendants then and there having the present ability to continue to beat plaintiff, and carry out their threats to kill plaintiff and/or beat, strangle, assault, handcuff, falsely arrest, falsely imprison, falsely search and seize, plaintiff again, acting under color of authority and pretense of law. Plaintiff was not arrested.

V

That defendants' acts and threatened acts violate the First, Fourth, Sixth, Seventh and Fourteenth Amendments to the Constitution of the United States, depriving plaintiff privileges and immunities.

VI

That by reason of the wrongful and malicious acts of defendants, and each of them, and the pain/^{wounds}and fright caused plaintiff, plaintiff has suffered extreme and severe mental anguish, physical pain, and business losses and has been injured in mind and body and earning capacity as will be demonstrated at trial; DAMAGES pg 274.

Ronald Reagan-2760

VII

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the sum and costs to be proved at trial, compensa-

1 tory damages, punitive damages, and grant of such other relief
2 that this Court may deem just and proper.

3 FOURTH CAUSE OF ACTION

4 I

5 Plaintiff does hereby incorporate and adopt by reference,
6 all allegations set forth in Paragraphs I-VI, JURISDICTION (page 2).

7 II

8 Plaintiff does hereby incorporate and adopt by reference,
9 all allegations set forth in all causes of action herein, herein-
10 before and hereinafter complained of.

11 III

12 The Court has jurisdiction in this matter under Title 28,
13 United States Code, Secs. 1343, 1346(b), 2671 et seq., for depri-
14 vation of civil rights, assaults by police officers acting under
15 color of law, the enjoinder of unconstitutional actions of state
16 officials, for damages under the violations of the First, Fourth,
17 Sixth, Seventh Amendments, and the Due Process and Equal Protec-
18 tion Clauses of the Fourteenth Amendment to the United States Con-
19 stitution; Title 28, United States Code, Secs. 1331 et seq.; Title
20 42, United States Code, Secs. 1981 et seq., particularly §§ 1982,
21 1983, 1985, 1986, interference with Civil Rights, deprivation
22 under color of statute, ordinance, regulation, custom or usage
23 of a statute, ordinance, regulation, custom or usage of a State
24 of rights, privileges, and immunities secured by the Constitution
25 and laws of the United States; and controversies to which the
26 United States is a party, United States Constitution, Art. III,
27 Sec. 2.

Ronald Reagan-2761

28 IV

29 Plaintiff is a citizen of the United States, and the amount
30 in controversy exceed Ten Thousand (\$10,000.00) Dollars, exclu-
31 sive of interest and costs.

1 V

2 Defendants are:

3 1. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J.
4 YOUNGER, headquarters address of 555 Capitol Mall, Sacramento,
5 California.

6 2. Def. J.C. HARRIS, Office of Attorney General.

7 VI

8 Plaintiff does not know the true names and capacities of
9 defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
10 therefore sues these defendants by such fictitious names. Plain-
11 tiff will amend this complaint to allege their true names and
12 capacities when ascertained. Plaintiff is informed and believes
13 and thereon alleges that each of the fictitiously named defen-
14 dants is responsible in some manner for the occurrences herein,
15 hereinbefore, and hereinafter alleged, and that Plaintiff's dam-
16 ages as herein alleged were caused and proximately caused by such
17 defendants, acting under color of authority and pretense of law.

18 VII

19 In 1972, defendants STATE OF CALIFORNIA, ATTORNEY GENERAL
20 EVELLE J. YOUNGER, security officer, J.C. HARRIS refused to ac-
21 cent plaintiff's filing of charges of criminal acts in California
22 and wrongfully, unlawfully, intentionally, and violently assaulted
23 plaintiff/by threatening plaintiff with "... we know where you
24 are. We can come and get you at the drop of a sombrero...", with
25 such venom and menace in defendants' Harris' voice and words that
26 plaintiff was immediately placed in great fear for his life and
27 physical well being, deprived of privileges and immunities.

Ronald Reagan-2762

28 VIII

29 That by reason of the wrongful and malicious acts of defen-
30 dants and of the fright caused plaintiff, plaintiff began immedi-
31 ately to look around thinking state law enforcement officers,
32 agents, employees, or others, were "on the way", and that plain-

1 tiff shortly would be unlawfully beaten, maimed, murdered, har-
2 assed, or falsely arrested on the spot by armed officers under
3 the color of authority and law breaking down door, - guns drawn,
4 in malicious, wanton, willful or reckless disregard for plaintiff's
5 rights and the rights of others.

6 IX

7 That in 1972, defendants, and each of them, knowingly and
8 willfully conspired and agreed among themselves to suppress and
9 withhold from law enforcement wrongfully plaintiff BRONSON's new
10 lifesaving firearms and related technologies.

11 X

12 That defendants, and each of them, did the acts and things
13 herein alleged pursuant to, and in furtherance of, the conspiracy
14 and agreement above alleged, and hereinafter and hereinbefore
15 complained of, acting in official capacity under color of law.

16 XI

17 By reason of the wrongful, intentional, conspiratorial, and
18 malicious acts of defendants, and each of them, and of the fright
19 thereby caused plaintiff, plaintiff has suffered extreme and
20 severe mental anguish and physical pain and has been injured in
21 mind and body, the nature and extent of which shall be proved at
22 trial, and as incorporated herein under DAMAGES from page

23 274.

Ronald Reagan-2763

24 XII

25 WHEREFORE, plaintiff demands judgment against defendants,
26 and each of them, the sum and costs of which shall be proved at
27 trial, compensatory and punitive damages, and just and proper re-
28 lief.

29 FIFTH CAUSE OF ACTION

30 I

31 plaintiff does hereby incorporate and adopt by reference,
32 all allegations set forth in Paragraphs I through VI, JURISDIC-
TION (page 2); 23 USC 1346(b); 42 USC §1981 et seq; 28 USC §1343.

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II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinbefore and hereinafter complained of.

III

Plaintiff is a citizen of the United States whose business address is Post Office Box 588, Sacramento, California, and the amount in controversy exceeds ten thousand dollars (\$10,000.), exclusive of interest and costs.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants by such fictitious names for damages caused and proximately caused to plaintiff.

V

On August 17, 1972, Defendants STATE OF CALIFORNIA, STATE ATTORNEY GENERAL EVELLE J. YOUNGER, special agent ANDREW TICKVITZA without just cause or provocation wrongfully, unlawfully and intentionally/conspired and acted to deliberately intimidate and harass person known by plaintiff at that person's place of employment in malicious, wanton, willful or reckless and conspiratorial disregard for the rights and privacy of plaintiff and others. Under the color of authority, defendants' Tickvitza's conduct and words caused immediate fear, apprehension and alarm for that person's safety, the safety of Plaintiff BRONSON, and the safety of others.

Ronald Reagan-2764
VI

When Plaintiff BRONSON was informed of Defendants' Tickvitza's wrongful, malicious conduct toward person known to plaintiff, plaintiff was immediately alarmed and apprehensive for his personal safety and well being, and feared for the safety and well being of others. Plaintiff feared that law enforcement officers, under color of authority and law, were immediately acting in official capacities, and deprive plaintiff, under color of

such police authority, viciously attack plaintiff with deadly
1 weapons, ambush plaintiff, and deprive plaintiff of/privileges and Constitutional
2 immunities by force, violence, maiming, attempted murder on plaintiff
3 and others. Plaintiff and others remained in constant fear and
4 dread for their safety from that time forward.

5 VII

6 That from 1972 forward, defendants, and each of them, know-
7 ingly and willfully conspired and agreed among themselves to sup-
8 press and wrongfully withhold from law enforcement Plaintiff
9 BRONSON's new lifesaving firearms and related technologies by
10 terror tactics and threats to the lives and personal safety of
11 plaintiff and others, violating I, IV, VI, VII and XIV Amendments.

12 VIII

13 That defendants, and each of them, did the acts and things
14 herein alleged pursuant to, and in furtherance of, the conspiracy
15 and agreement above alleged, and hereinafter and hereinbefore
16 complained of.

17 IX

18 By reason of the wrongful, intentional, conspiratorial, and
19 malicious acts of defendants, and each of them, and of the fright
20 thereby caused plaintiff, plaintiff has suffered extreme and
21 severe mental anguish and physical pain and has been injured in
22 mind and body, the nature and extent of which shall be proved at
23 trial, and as incorporated herein under DAMAGES from page

24 274. Ronald Reagan-2765

25 X

26 WHEREFORE, plaintiff demands judgment against defendants,
27 and each of them, the sum and costs of which shall be proved at
28 trial, and compensatory and punitive damages, & just and proper relief.

29 SIXTH CAUSE OF ACTION

30 I

31 Plaintiff does hereby incorporate and adopt by reference,
32 all allegations set forth in Paragraph I-VI, JURISDICTION (pg 2);

1 Title 28, United States Code, §1343, §1346(b); 42 USC §1981 et seq.

II

3 Plaintiff does hereby incorporate and adopt by reference,
4 all allegations set forth in all causes of action herein complain-
5 ed, hereinafter complained of, and hereinbefore complained of.

7 Plaintiff is a citizen of the United States, and the amount
8 in controversy exceeds ten thousand dollars.

IV

10 Plaintiff does not know the true names and capacities of de-
11 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
12 therefore sues these defendants by such fictitious names. Plain-
13 tiff will amend this complaint to allege their true names and
14 capacities when ascertained. Plaintiff is informed and believes
15 and thereon alleges that each of the fictitiously named defen-
16 dants is responsible in some manner for the occurrences herein,
17 hereinbefore, and hereinafter alleged, and that Plaintiff's dam-
18 ages as herein alleged were caused and proximately caused by
19 such defendants.

7

Frequently in 1973, on April 15/26, 1974, May 3, 1974, May 14, 1974, November 5, 1976, June 4, 1977, and February 25, 1978, defendants JOHN DOES ONE THROUGH ONE HUNDRED have acted with malicious, wanton, willful or reckless disregard for plaintiff's rights and safety, and the rights and safety of others, and without cause or provocation /sabotaged plaintiff's business equipment to the severe extent that plaintiff and others would be permanently maimed or killed in attempting to regularly use the sabotaged equipment.

...Ronald Reagan-2766

30 That by reason of the wrongful and malicious acts of defen-
31 dants and of the immediate and continuing alarm, fear, apprehen-
32 sion for plaintiff's personal safety and well being

was deprived privileges and immunities guaranteed to plaintiff in I, IV, VI, VII and XIV Amendments. Plaintiff feared that at any time defendants, and each of them, some members of the law enforcement community with duty to protect plaintiff and others, - not harm them, would unlawfully murder, permanently maim or destroy plaintiff and others, and business equipment regularly used.

VII

That in 1972 forward, defendants, and each of them, knowingly and willfully conspired and agreed among themselves to suppress and withhold from law enforcement, wrongfully, plaintiff BRONSON's new lifesaving firearms and related technologies by terror tactics and threats to the lives and personal safety of plaintiff and others, without cause or provocation.

VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complained of.

IX

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

X

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be demonstrated at trial, compensatory damages, punitive damages, and the grant of such other relief as this Court may deem just and proper.

Ronald Reagan-2767

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1 ness premises without completing plaintiff's lawful business.

2 VI

3 Plaintiff BRONSON was immediately alarmed, fearful, and ap-
4 prehensive for his personal safety and well being, and for the
5 safety and well being of others. Plaintiff feared that defen-
6 dants, and each of them, were shortly to beat, maim or murder
7 plaintiff, and as defendants, and each of them, intended, plain-
8 tiff's well founded criminal charges of illegal wiretapping and
9 other illegal electronic invasion of plaintiff's business equip-
10 ment, were ignored and continued to present time by said defen-
11 dants, and each of them; defendants, and each of them refuse to
12 investigate, remove and otherwise take corrective action.

13 VII

14 That in 1972 forward, defendants, and each of them, know-
15 ingly and willfully organized and caused to be organized conspir-
16 acy and agreement among themselves, and each of them, to suppress
17 and wrongfully withhold from law enforcement plaintiff BRONSON's
18 new lifesaving firearms and related technologies by illegal acts
19 and conspiracies to illegally wiretap plaintiff's business tele-
20 phone without cause.

21 VIII

22 That defendants, and each of them, did the acts and things
23 herein alleged pursuant to, and in furtherance of, the conspiracy
24 and agreement above alleged, and hereinafter and hereinbefore
25 complained of.

26 IX

27 By reason of the wrongful, intentional, and malicious acts
28 of defendants, and each of them, and the fright thereby caused
29 plaintiff and others, plaintiff has suffered extreme and severe
30 mental anguish and physical pain, and has been injured in mind
31 and body and earning capacity, and been deprived privileges and
32 immunities guaranteed to plaintiff by Amendments I, IV, VI, VII, XIV,

1 the nature and extent of which shall be proved at trial, DAMAGES
pg 274.

2 X

3 WHEREFORE, plaintiff demands judgment against defendants,
4 and each of them, the nature, extent, sum and costs of which
5 shall be proved at trial, and for compensatory and punitive
6 damages, and for such other relief as is deemed just and proper
7 by this Court.

8 EIGHTH CAUSE OF ACTION

9 I

10 Plaintiff does hereby incorporate and adopt by reference,
11 all allegations set forth in JURISDICTION (page 2); Title 28, USC
12 §§1343,1346(b); 42 USC §1981 et seq.; the Fourteenth Amendment to
13 the Constitution;

14 II

15 Plaintiff does hereby incorporate and adopt by reference,
16 all allegations set forth in all causes of action hereinbefore
17 and hereinafter complained of, for loss of rights under color of
18 authority, particularly as protected by the Fourth Amendment to
19 the Constitution of the United States.

20 III

21 Plaintiff is a citizen of the United States, the UNITED
22 STATES is a party, and the amount in controversy exceed, exclu-
23 sive of interests and costs, Ten Thousand Dollars.

24 IV

25 Plaintiff does not know the true names and capacities of
26 defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
27 therefore sues these defendants, and each of them, by such ficti-
28 tious names for damages caused and proximately caused to plain-
29 tiff.

Ronald Reagan-2770

30 V

31 Defendants are:

32 1. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTOR CLARENCE

M. KELLEY.

2. Def. AMERICAN TELEPHONE AND TELEGRAPH COMPANY (AT&T),
headquarters 195 Broadway, New York, New York 10007.

3. Def. PACIFIC TELEPHONE AND TELEGRAPH COMPANY DIVISION OF
AT&T, Northern California Headquarters, 140 New Montgomery Street,
San Francisco, California 94105; Sacramento Area Headquarters,
1407 "J" Street, Sacramento, California.

4. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J.
YOUNGER, GOVERNOR EDMUND G. BROWN, Jr., GOVERNOR RONALD REAGAN,
State Capitol, Sacramento, California.

VI

On the following example dates, 1973: 2/9,13; 3/12-15; 7/13;
8/30,31; 9/4,24; 11/20; 1974: 1/10,16; 2/7,28; 5/8,14; 11/8,14;
12/6,7; 1975: 1/15; 2/4,5,8,9,11; 4/21,22; 7/8; 9/9; 1976: 1/19,
defendants agents and employees illegally electronically caused
or forced plaintiff's business telephone to "ring" (strange sound)
or "malfunction", especially during off non-business hours. With-
out Court order, search warrant, without cause or provocation,
under color of authority and pretense of law, defendants, and each
of them, maintained and maintain to present illegal surveillance
of plaintiff's business telephone in malicious, wanton, willful,
intentional, wrongful, conspiratorial disregard for the rights of
plaintiff and others each and every time, depriving to plaintiff
privileges and immunities guaranteed by Amendments I, IV, V, VI, VII,
and XIV of the Consitution of the United States.

VII

That each and every time defendant(s) did these acts and
things herein complained of, defendant(s) invaded plaintiff's
right of privacy and right to uninterrupted, nonmonitored business
telephone use for lawful purposes.

Ronald Reagan-2771

VIII

The above-mentioned wrongful, conspiratorial, malicious, war-
rantless, and willful acts constituted an invasion of plaintiff's

1 right of privacy in that plaintiff in no way consented to or author
2 ized the warrantless search and illegal wiretap and electronic
3 invasion of plaintiff's business telephone, nor did plaintiff
4 submit voluntarily to these wrongful invasions by wiretapping il-
5 legally of plaintiff's business telephone.

6 IX.

7 The above-mentioned acts and conduct of the defendants, and
8 each of them, claimed by them to be under federal and/or state
9 and/or regulated public utility authority, constituted an abuse
10 of their federal and/or state and/or regulated public utility
11 authority and was not within their scope of employment as federal
12 and/or state and/or regulated public utility agents, employees or
13 servants, in that their acts and conduct were not based on the
14 exercise or performance of discretionary function or duty assumed
15 by them as agents or employees or servants of the federal govern-
16 ment's FEDERAL BUREAU OF INVESTIGATION and/or state government's
17 ATTORNEY GENERAL'S OFFICE and/or regulated public utility and
18 were not acts and conduct done pursuant to the regulations of the
19 UNITED STATES ATTORNEY GENERAL/FEDERAL BUREAU OF INVESTIGATION
20 and/or STATE ATTORNEY GENERAL'S OFFICE and/or regulated public
21 TELEPHONE utility and were acts performed within the scope of de-
22 fendant(s) employment but without exercising due care while acting
23 within the scope of their employment, and defendants, and each of
24 them, acted in fraud, corruption or malice.

Ronald Reagan-2772

25 X

26 As a result of the above-mentioned conduct of the defendants,
27 and each of them, plaintiff was deprived of rights, privileges,
28 and immunities secured to him by the Constitution and Laws of the
29 United States in that such conduct constituted an arbitrary in-
30 trusion by defendant(s) upon the security of plaintiff's privacy
31 and body, thereby depriving plaintiff of life, liberty, and prop-
32 erty without due process of law and plaintiff is entitled to re-

1 lief under Title 42 of the United States Code under Section 1983.

2 XI

3 That by reason of the injuries inflicted by defendants, and
4 each of them, plaintiff was frightened and has suffered bodily
5 pain and discomfort, and has suffered great pain of mind and
6 mental anguish and emotional distress.

7 XII

8 That from 1972 to present time, defendants, and each of them,
9 knowingly and willfully organized and caused to be organized
10 conspiracy and agreement among themselves, and each of them, and
11 with others, to suppress and wrongfully withhold from law enforce-
12 ment plaintiff's new lifesaving firearms and related technologies
13 by illegal acts

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Ronald Reagan-2773

1 and conspiracies to illegally wiretap plaintiff's business tele-
2 phone without cause or provocation under color of authority.

3 X

4 That defendants, and each of them, did the acts and things
5 herein alleged pursuant to, and in furtherance of, the conspiracy
6 and agreement above alleged, and hereinafter and hereinbefore
7 complained of.

8 XI

9 By reason of the wrongful, intentional, and malicious acts
10 of defendants, and each of them, and the fright thereby caused
11 plaintiff and others, plaintiff has suffered extreme and severe
12 mental anguish and physical pain, and has been injured in mind
13 and body and earning capacity, the nature and extent of which
14 shall be proved at trial, and as incorporated herein under DAM-
15 AGES from page 274.

16 XII

17 WHEREFORE, plaintiff demands judgment against defendants,
18 and each of them, compensatory and punitive damages, sum and costs
19 to be proved at trial, and other just and proper relief.

20 NINTH CAUSE OF ACTION

21 I

22 Plaintiff does hereby incorporate and adopt by reference,
23 all allegations set forth in Paragraph I-VI, JURISDICTION, Title
24 28 U.S.C./§1343, §1346(b); 42 USC §1981 et seq; Amendment XIV.

25 II

26 Plaintiff does hereby incorporate and adopt by reference,
27 all allegations set forth in all causes of action hereinbefore and
28 hereinafter complained of, loss of rights under color of authority

Ronald Reagan-2774

29 III

30 Plaintiff is a citizen of the United States, and the amount
31 in controversy exceeds ten thousand dollars; deprivations to Due
32 Process and Equal Protection Clauses of Amendment XIV, Constitution

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

From 1972 to present time, defendants CITY OF SACRAMENTO, SACRAMENTO POLICE DEPARTMENT, POLICE CHIEF WILLIAM J. KINNEY, agents and employees, without cause or provocation, wrongfully, unlawfully, intentionally, and maliciously assaulted plaintiff with deadly weapons (guns and cars), and did other wrongful acts. Defendants' uniformed officers repeatedly drove CITY OF SACRAMENTO motor vehicles and harassed, followed, stalked, tracked, attempted to ram plaintiff's business automobile, and otherwise abuse plaintiff, as plaintiff conducted plaintiff's lawful business. Further, defendants, and each of them, did, under color of authority and pretense of law:

(1) Track plaintiff through the streets of Sacramento by CITY OF SACRAMENTO decaled vehicles and uniformed officers of the SACRAMENTO POLICE DEPARTMENT throughout the summer of 1973, and especially January 23, 1974 and May 8, 1974; followed plaintiff for blocks at a time in 1975 and 1976, especially May 5, 1975, February 10, 1976, and April 25, 1976.

(2) Come close enough to plaintiff during the summer of 1974 and on July 23, 1975 for plaintiff to identify "BADGE NO. 295" of the CITY OF SACRAMENTO POLICE DEPARTMENT.

(3) Come close enough to plaintiff for plaintiff to identify by "BADGE NO. 341", OFFICER GORSKI OF THE SACRAMENTO POLICE DEPARTMENT on October 3, 1974 and May 14, 1975.

(4) That on October 3, 1974, defendants' OFFICER GORSKI tracked and menaced plaintiff all over McKinley Park, Sacramento.

(5) That the attempted ramming of plaintiff's legally parked business vehicle occurred on or about February 10, 1976.

All conspiracies and acts herein complained of deprived plaintiff

of lawful, unharassed use of CITY OF SACRAMENTO streets.

VI

That from 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally acting and conspiring to assault plaintiff with deadly weapons repeatedly.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

VII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved attrial, and as incorporated herein under DAMAGES from page 274.

VIII

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, sum and costs to be proved at trial, and other just and proper relief from Court.

TENTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraphs I-VI, JURISDICTION, Title §1343, 23 U.S.C./§1346(b); 42 USC §1931 et seq., Amendment XIV.

II Ronald Reagan-2776

Plaintiff does hereby incorporate and adopt by reference,

1 all allegations set forth herein, deprivations of privileges and
2 immunities Constitutionally guaranteed under color of authority.

3 III

4 Plaintiff is a citizen of the United States, and the amount
5 in controversy exceeds ten thousand dollars.

6 IV

7 Plaintiff does not know the true names and capacities of de-
8 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
9 therefore sues these defendants, and each of them, by such ficti-
10 tious names for damages caused and proximately caused to plaintiff.

11 V

12 On or about January 23, 1974, defendants STATE OF CALIFORNIA,
13 STATE CONTROLLER HOUSTON I. FLOURNOY caused defendants STATE OF
14 CALIFORNIA, STATE POLICE, and others, to wrongfully, unlawfully,
15 intentionally, and violently assault plaintiff with deadly weap-
16 ons on private business property/ Defendants, and each of them,
17 sent state agents and employees in two (2) cars to willfully, un-
18 lawfully and violently use force on plaintiff, or other malicious,
19 wanton, willful or reckless disregard for plaintiff's rights. DE-
20 fendants' agents and employees trespassed on business property
21 and prevented plaintiff from leaving building. Defendants' agents
22 and employees sat in the cars for some time, assaulting plaintiff,
23 humiliating, outraging and embarrassing plaintiff, and prevented
24 plaintiff from conducting his lawful business activities.

Ronald Reagan-2777

25 VI

26 That in 1972 forward, defendants, and each of them, knowingly
27 and willfully organized and caused to be organized conspiracy and
28 agreement among themselves, and each of them, and with others, to
29 suppress and wrongfully withhold from law enforcement plaintiff's
30 new lifesaving firearms and related technologies by illegally
31 assaulting plaintiff, and deprived plaintiff of privileges and im-
32 munities guaranteed by the Constitution under color of authority
and law.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, sum and costs to be proved at trial, and other relief deemed just and proper.

ELEVENTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraphs I-VI, JURISDICTION, Title §1343, 23 U.S.C./§1346(b); 42 USC §1981 Et seq.; Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth herein, deprivations of privileges and immunities Constitutionally guaranteed under color of authority.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceed ten thousand dollars.

Ronald Reagan-2778

IV

Plaintiff does not know the true names and capacities of defendants sued herin as JOHN DOES ONE THROUGH ONE HUNDRED, and

1 therefore sues these defendants, and each of them, by such facti-
2 tious names for damages caused and proximately caused to plaintiff.

3 V

4 On or about January 23, 1976, defendants STATE OF CALIFORNIA,
5 CALIFORNIA HIGHWAY PATROL, agents and employees, acting under
6 color of authority and pretense of law, without cause or provocation,
7 wrongfully, unlawfully, intentionally, maliciously, and violently
8 in assault on plaintiff while taking his usual therapeutic morn-
9 ing walk at Miller Park, a walk known to law enforcement agents
10 and employees. Defendants made roaring, wide-throttle swoop too
11 low over plaintiff, circling plaintiff in a roaring low "U" turn.
12 Said defendants, and each of them, acted in malice, wanton, wil-
13 ful or reckless disregard for plaintiff's rights, and almost
14 burst plaintiff's eardrums, caused violent, blinding headache,
15 and rendered plaintiff unable to drive for several hours.

16 VI

17 That in 1972 forward, defendants, and each of them, knowing-
18 ly and willfully organized and caused to be organized conspiracy
19 and agreement among themselves, and each of them, and with others,
20 to suppress and wrongfully withhold from law enforcement plain-
21 tiff's new lifesaving firearms and related technologies by ille-
22 gally assaulting and battering plaintiff .

23 VII

24 That defendants, and each of them, did the acts and things
25 herein alleged pursuant to, and in furtherance of, the conspiracy
26 and agreement herein alleged, and hereinafter and hereinbefore
27 complained of, acting under color of authority and pretense of
28 law.

Ronald Reagan-2779

29 VIII

30 By reason of the wrongful, intentional, and malicious acts
31 of defendants, and each of them, and the wounds and
32 plaintiff, plaintiff has suffered extreme and severe mental an-

1 guish and physical pain, and has been injured in mind and body
2 and earning capacity, the nature and extent of which shall be
3 proved at trial, and as incorporated herein under DAMAGES from
4 page 274.

5 IX

6 WHEREFORE, plaintiff demands judgment against defendants,
7 and each of them, compensatory and punitive damages, sum and costs
8 to be proved at trial, and such other relief deemed just and proper.

9 TWELFTH CAUSE OF ACTION

10 I

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action filed herein.

13 II

14 Plaintiff does hereby incorporate and adopt by reference,
15 all allegations set forth in JURISDICTION (page 2); Title 28 USC
16 §1343,
16 §1346(b); 42 USC §1981 et seq; Equal Protection Clause XIV Amend.

17 III

18 Plaintiff is a citizen of the United States, and the amount
19 in controversy exceeds ten thousand dollars.

20 IV

21 Plaintiff does not know the true names and capacities of de-
22 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
23 therefore sues these defendants, and each of them, by such ficti-
24 tious names for damages caused and proximately caused to plaintiff.

25 v Ronald Reagan-2780

26 On or about February 3, 1976, defendants STATE OF CALIFORNIA,
27 without cause or provocation
27 CALIFORNIA HIGHWAY PATROL, and others, retaliated against plaintiff
28 for reporting on or about January 23, 1976, to defendant CALIFORNIA
29 STATE HIGHWAY PATROL OFFICIALS, and others, that defendants ille-
30 gally, unlawfully, and negligently flew defendant's pursuit plane
31 in diving, circling assault of plaintiff on January 23, 1976.
32 Defendants, under color of authority and pretense of law, tracked,

1 "dogged", and harassed plaintiff on the streets of Sacramento
2 while plaintiff was attempting to conduct his lawful business.

3 VI

4 That from 1972 forward, defendants, and each of them, know-
5 ingly and willfully organized and caused to be organized conspir-
6 acy and agreement among themselves, and each of them, and with
7 others, to suppress and wrongfully withhold from law enforcement
8 plaintiff's new lifesaving firearms and related technologies by
9 illegally assaulting plaintiff.

10 VII

11 That defendants, and each of them, did the acts and things
12 herein alleged pursuant to, and in furtherance of, the conspiracy
13 and agreement herein alleged, and hereinafter and hereinbefore
14 complained of, acting under color of authority and pretense of
15 law, and deprived plaintiff of privileges and immunities from harm.

16 VIII

17 By reason of the wrongful, intentional, and malicious acts
18 of defendants, and each of them, and the fright thereby caused
19 plaintiff, plaintiff has suffered extreme and severe mental an-
20 guish and physical pain, and has been injured in mind and body
21 and earning capacity, the nature and extent of which shall be
22 proved at trial, and as incorporated herein under DAMAGES from
23 page 274.

24 IX

25 WHEREFORE, plaintiff demands judgment against defendants,
26 and each of them, compensatory and punitive damages, which shall
27 be proved at trial, and other relief deemed just and proper by Court

28 THIRTEENTH CAUSE OF ACTION

29 I Ronald Reagan-2781

30 Plaintiff does hereby incorporate and adopt by reference,
31 all allegations set forth in Paragraphs I-VI, JURISDICTION, Title
32 23 U.S.C./§1346(b); 42 USC §1931 et seq; Amendment XIV.

1 II

2 Plaintiff does hereby incorporate and adopt by reference,
3 all allegations set forth in all causes of action filed and
4 complained of herein, for deprivations under color of authority.

5 III

6 Plaintiff is a citizen of the United States, and the amount
7 in controversy exceeds ten thousand dollars.

8 IV

9 Plaintiff does not know the true names and capacities of de-
10 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
11 therefore sues these defendants, and each of them, by such ficti-
12 tious names for damages caused and proximately caused to plaintiff.

13 v

14 On or about February 3, 1974, defendants STATE OF CALIFORNIA
15 and CHIEF GUY R. OATES,
16 CALIFORNIA STATE POLICE/assaulted, falsely arrested, and falsely
without cause or provocation
17 imprisoned plaintiff/in the California State Capitol, and refused
18 to permit plaintiff to leave the offices of defendant STATE POLICE
19 WHEN PLAINTIFF DEMANDED TO DO SO. Said defendants, and each of
20 them, stopped plaintiff from exercising his right to freedom of
21 speech, due process of law, and right to conduct plaintiff's
22 lawful business in a lawful manner, and the right to pursue plain-
23 tiff's lawful activities in a lawful manner without intimidation
24 and interference and malicious disregard for plaintiff's rights
under the color of authority and pretense of law.

25 v Ronald Reagan-2782

26 That from 1972 forward, defendants, and each of them, know-
27 ingly and willfully organized and caused to be organized conspir-
28 acy and agreement among themselves, and each of them, and with
29 others, to suppress and wrongfully withhold from law enforcement
30 plaintiff's new lifesaving firearms and related technologies by
31 illegally assaulting, falsely imprisoning and falsely arresting
32 plaintiff, depriving plaintiff of Constitutional privileges and im-

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VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, sum and costs to be proved at trial, and other relief deemed just and proper.

FOURTEENTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 USC §1343, §1346(b); 42 USC §1981 et seq.; Amendment XIV, U.S. Constitution.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of for loss of privileges and immunities guaranteed plaintiff.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

Ronald Reagan-2783

IV

Plaintiff does not know the true names and capacities of de-

1 defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
2 therefore sues these defendants, and each of them, by such ficti-
3 tious names for damages caused and proximately caused to plaintiff.

4 V

5 On or about September 29, 1972, defendants STATE OF CALI-
6 FORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER, and others, agents
7 and employees, under color of authority and pretense of law,
8 harassed, abused, intimidated, embarrassed, humiliated, restrained,
9 and otherwise obstructed and interfered with plaintiff in the
10 U.S. Post Office, 8th and I Streets, Sacramento./ One agent or
11 employee of defendants identified himself as a "Mr. Baier". De-
12 fendants agents and employees were not only accosting plaintiff
13 for defendant CALIFORNIA STATE ATTORNEY GENERAL YOUNGER, but
14 also for defendant FEDERAL BUREAU OF INVESTIGATION and the NIXON
15 ADMINISTRATION.

16 VI

17 Plaintiff was obstructed from leaving the post office as he
18 wished by said two (2) agents and employees of defendants acting
19 under color of authority and pretense of law. Plaintiff was fear-
20 ful and apprehensive about being attacked and "jumped" by two (2)
21 armed men. Plaintiff demanded that said defendants, their agents
22 and employees, and each of them, submit all questions to plaintiff
23 in writing and addressed to plaintiff's attorney. Said defendants
24 refused and forcibly conducted and continued their assault,
25 obstruction, harassment, intimidation, humiliation, and embarrass-
26 ment of plaintiff in an open public place crowded with innocent
27 people seeking postal service, stopping plaintiff in his business.

28 VII Ronald Reagan-2784

29 That from 1972 forward, defendants, and each of them, and
30 with others, knowingly and willfully organized and caused to be
31 organized conspiracy and agreement among themselves, to suppress
32 and wrongfully withhold from law enforcement plaintiff's new

lifesaving law enforcement technologies by illegally assaulting
1 and obstructing plaintiff, and depriving plaintiff of privileges
2 and immunities guaranteed to plaintiff by I, IV, VI, VII, XIV Amendmts.

3 VIII

4 That defendants, and each of them, did the acts and things
5 herein alleged pursuant to, and in furtherance of, the conspiracy
6 and agreement herein alleged, and hereinafter and hereinbefore
7 complained of, acting under color of authority and pretense of
8 law.

9 IX

10 By reason of the wrongful, intentional, and malicious acts
11 of defendants, and each of them, and the fright thereby caused
12 plaintiff, plaintiff has suffered extreme and severe mental an-
13 guish and physical pain, and has been injured in mind and body
14 and earning capacity, the nature and extent of which shall be
15 proved at trial, and as incorporated herein under DAMAGES from
16 page 274.

17 X

18 WHEREFORE, plaintiff demands judgment against defendants,
19 and each of them, compensatory and punitive damages, to be proved
20 at trial, and such other relief as deemed just and proper by Court.

21 FIFTEENTH CAUSE OF ACTION

22 I

23 Plaintiff does hereby incorporate and adopt by reference,
24 all allegations set forth in JURISDICTION (page 2);; Title 28 USC
25 §1343,
26 §1346(b); 42 USC §1981 et seq.; Constitution Amendment XIV.

26 II

27 Plaintiff does hereby incorporate and adopt by reference,
28 all allegations set forth in all causes of action herein com-
29 plained of, loss of privileges/immunities under color of law.

Ronald Reagan-2785

30 III

31 Plaintiff is a citizen of the United States, and the amount
32 in controversy exceeds ten thousand dollars.

1 IV

2 Plaintiff does not know the true names and capacities of de-
3 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
4 therefore sues these defendants, and each of them, by such ficti-
5 tious names for damages caused and proximately caused to plaintiff.

6 V

7 On or about September 21 and 27, 1973, defendants STATE OF
8 CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF GUY OATES, and others,
9 without cause or provocation,
10 caused STATE POLICE agents and employees to stalk, track and "dog"
11 plaintiff, on foot and in car, away from State property. Under
12 color of authority and pretense of law, said defendants prevented
13 plaintiff from freely exercising plaintiff's rights of due process
14 of law, lawful pursuit of business activities, free from fear or
15 intimidation or worrying as to just when defendants' uniformed
16 and gun-carrying officers would assault and injure plaintiff
severely in his body or mind, or inflicting other losses of rights.

17 VI

18 That from 1972 forward, defendants, and each of them, and
19 with others, knowingly and willfully organized and caused to be
20 organized conspiracy and agreement among themselves, to suppress
21 and wrongfully withhold from law enforcement plaintiff's new
22 lifesaving firearms and related technologies by illegally assault-
23 ing plaintiff, denying plaintiff privileges and immunities illegally.

24 VII

25 That defendants, and each of them, did the acts and things
26 herein alleged pursuant to, and in furtherance of, the conspiracy
27 and agreement herein alleged, and hereinafter and hereinbefore
28 complained of, acting under color of authority and pretense of
29 law.

Ronald Reagan-2786

30 VIII

31 By reason of the wrongful, intentional, and malicious acts
32 of defendants, and each of them, and the fright thereby caused

1 plaintiff, plaintiff has suffered extreme and severe mental an-
2 guish and physical pain, and has been injured in mind and body
3 and earning capacity, the nature and extent of which shall be
4 proved at trial, and as incorporated herein under DAMAGES from
5 page 274.

6 IX

7 WHEREFORE, plaintiff demands judgment against defendants,
8 and each of them, compensatory and punitive damages, to be proved
9 at trial, and such other relief deemed just and proper by Court.

10 SIXTEENTH CAUSE OF ACTION

11 I

12 Plaintiff does hereby incorporate and adopt by reference,
13 all allegations set forth in JURISDICTION (page 2); Title 23 USC
14 §1343, §1346(b); 42 USC §1981 et seq; Constitutional Amendment XIV.

15 II

16 Plaintiff does hereby incorporate and adopt by reference,
17 all allegations set forth in all causes of action herein complain-
18 ed of for loss of privileges and immunities under color of law.

19 III

20 Plaintiff is a citizen of the United States, and the amount
21 in controversy exceeds ten thousand dollars; controversies to
22 which the United States is a party (Const. Art.III Sec.2).

23 IV

24 Plaintiff does not know the true names and capacities of de-
25 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
26 therefore sues these defendants, and each of the, by such ficti-
27 tious names for damages caused and proximately caused to plaintiff.

28 √Ronald Reagan-2787

29 On or about September 30, 1972, defendant FEDERAL BUREAU OF
30 INVESTIGATION, agents and employees, under color of authroity and
31 without cause or provocation,
32 pretense of law, /wrongfully, unlawfully, intentionally, and vio-
lently assaulted plaintiff with deadly weapons on private business

1 property. Defendants, and each of them, sent FBI agents and em-
2 ployees to willfully, unlawfully and violently use force on plain-
3 tiff, or other malicious, wanton, willful or reckless disregard
4 for plaintiff's rights. Defendants' agents and employees tres-
5 passed on business property and prevented plaintiff from leaving
6 building. Defendants' agents and employees sat in the car for
7 some time, assaulting plaintiff, humiliating, outraging and em-
8 barrassing plaintiff, and prevented plaintiff from exercising his
9 privileges and immunities to conduct his lawful business activities

10 VI

11 That in 1972 forward, defendants, and each of them, know-
12 ingly and willfully organized and caused to be organized conspir-
13 acy and agreement among themselves, and each of them, and with
14 others, to suppress and wrongfully withhold from law enforcement
15 plaintiff's new lifesaving firearms and related technologies by
16 illegally assaulting plaintiff.

17 VII

18 That defendants, and each of them, did the acts and things
19 herein alleged pursuant to, and in furtherance of, the conspiracy
20 and agreement herein alleged, and hereinafter and hereinbefore
21 complained of, acting under color of authority and pretense of
22 law.

23 VIII

24 By reason of the wrongful, intentional, and malicious acts
25 of defendants, and each of them, and the fright thereby caused
26 plaintiff and others, plaintiff has suffered extreme and severe
27 mental anguish and physical pain, and has been injured in mind
28 and body and earning capacity, the nature and extent of which
29 shall be proved at trial, and as incorporated herein under
30 DAMAGES from page 274. Ronald Reagan-2788

31 IX

32 WHEREFORE, plaintiff demands judgment against defendants,

and each of them, compensatory and punitive damages, to be proved
at trial, and such other relief deemed proper and just by Court.

SEVENTEENTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference,
all allegations set forth in JURISDICTION (page 2); Title 28 USC
§1343,
§1346(b); 42 USC §1981 et seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference,
all allegations set forth in all causes of action complained of
herein for loss of privileges and immunities under color of law.

III

Plaintiff is a citizen of the United States, and the amount
in controversy exceeds ten thousand dollars; U.S. a party.

IV

Plaintiff does not know the true names and capacities of de-
fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
therefore sues these defendants, and each of them, by such ficti-
tious names for damages caused and proximately caused to plaintiff.

V

On or about October 4, 1972, defendant FEDERAL BUREAU OF
INVESTIGATION agents and employees, including one "TOMMY RAY",
without cause or provocation,
under color of authority and pretense of law, harassed, abused,
intimidated, embarrassed, humiliated, restrained, and otherwise
obstructed and interfered with plaintiff in the U.S. Post Office,
3th and I Streets, Sacramento, and stopping plaintiff's business.

Ronald Reagan-2789

VI

Plaintiff was obstructed from leaving the Post Office as he
wished by said two (2) agents and employees of defendants FBI,
L. PATRICK GRAY DIRECTOR, acting under color of authority and
pretense of law. Plaintiff was fearful and apprehensive about
being attacked and "jumped" by two (2) armed men. Plaintiff de-
manded that said defendants, their agents and employees, and

1 each of them, submit all questions to plaintiff in writing and
2 addressed to plaintiff's attorney. Said defendants refused and
3 forcibly conducted and continued their assault, obstruction, har-
4 assment, intimidation, humiliation, and embarrassment of plaintiff
5 in an open public place crowded with innocent people, and deprived
6 plaintiff privilege and immunity to uninterrupted lawful business.

7 VII

8 When plaintiff managed to get out of the Post Office, de-
9 fendant's FBI agent "TOMMY RAY" stalked and "dogged" plaintiff
10 down the street to City Hall, up the stairs and into the City Hall
11 building. FBI agent "RAY" refused to not follow plaintiff.

12 VIII

13 That from 1972 forward, defendants, and each of them, and
14 with others, knowingly and willfully organized and caused to be
15 organized conspiracy and agreement among themselves, to suppress
16 and wrongfully withhold from law enforcement plaintiff's new life-
17 saving firearms and related technologies by illegally assaulting
18 and obstructing plaintiff, under color and pretense of authority.

19 IX

20 That defendants, and each of them, did the acts and things
21 herein alleged pursuant to, and in furtherance of, the conspiracy
22 and agreement herein alleged, and hereinafter and hereinbefore
23 complained of, acting under color of authority and pretense of
24 law, interfering with plaintiff's privileges and immunities.

25 X Ronald Reagan-2790

26 By reason of the wrongful, intentional, and malicious acts
27 of defendants, and each of them, and the fright thereby caused
28 plaintiff, plaintiff has suffered extreme and severe mental an-
29 guish and physical pain, and has been injured in mind and body
30 and earning capacity, the nature and extent of which shall be
31 proved at trial, and as incorporated herein under DAMAGES from
32 page 274.

1 XI

2 WHEREFORE, plaintiff demands judgement against defendants,
3 and each of them, compensatory and punitive damages, to be proved
4 at trial, and such other relief deemed just and proper by the Court.

5 EIGHTEENTH: CAUSE OF ACTION

6 I

7 Plaintiff does hereby incorporate and adopt by reference,
8 all allegations set forth in JURISDICTION (page 2); Title 28 USC
9 §1343, §1346(b); 42 USC §1981 se seq.; Constitutional Amendment XIV.

10 II

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action herein complained
13 of for loss of privileges and immunities under color of authority.

14 III

15 Plaintiff is a citizen of the United States, and the amount
16 in controversy exceeds ten thousand dollars; U.S. a party.

17 IV

18 Plaintiff does not know the true names and capacities of de-
19 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
20 therefore sues these defendants, and each of them, by such ficti-
21 tious names for damages caused and proximately caused to plaintiff.

22 Ronald Reagan-2791

23 On or about October 4, 1972, defendants FBI, JOHN REED AGENT
24 IN CHARGE, L. PATRICK GRAY DIRECTOR, agents and employees, under
25 color of authority and pretense of law, without cause or provocation, retaliated against plain-
26 tiff for plaintiff's insistence that the FBI immediately stop
27 harassment and abuse of Plaintiff BRONSON. FBI AGENT IN CHARGE
28 JOHN REED and other agents and employees forcibly, violently,
29 loudly, wrongfully, unlawfully, maliciously and wantonly, yelling,
30 "surrounded" the building in which plaintiff was conducting busi-
31 ness with drawn handguns, rifles and walkie talkies. Defendants
32 threatened violent force against plaintiff and trespassed on busi-

1 ness property and prevented plaintiff from leaving building. De-
2 fendants' agents and employees sat in cars and milled around the
3 building for some time, assaulting plaintiff, humiliating, out-
4 raging and embarrassing plaintiff, and prevented plaintiff from
5 conducting his lawful business activities.

6 VI

7 That in 1972 forward, defendants, and each of them, knowingly
8 and willfully organized and caused to be organized conspiracy and
9 agreement among themselves, and each of them, and with others, to
10 suppress and wrongfully withhold from law enforcement plaintiff's
11 new lifesaving firearms and related technologies by illegally
12 assaulting plaintiff.

13 VII

14 That defendants, and each of them, did the acts and things
15 herein alleged pursuant to, and in furtherance of, the conspiracy
16 and agreement herein alleged, and hereinafter and hereinbefore
17 complained of, acting under color of authority and pretense of
18 law, and invaded plaintiff's guaranteed privileges and immunities.

19 VIII

20 By reason of the wrongful, intentional, and malicious acts
21 of defendants, and each of them, and the fright thereby caused
22 plaintiff, plaintiff has suffered extreme and severe mental an-
23 guish and physical pain, and has been injured in mind and body
24 and earning capacity, the nature and extent of which shall be
25 proved at trial, and as incorporated herein under DAMAGES from
26 page 274.

Ronald Reagan-2792

27 IX

28 WHEREFORE, plaintiff demands judgment against defendants,
29 and each of them, the nature, extent, sum and costs of which
30 shall be proved at trial, and compensatory and punitive damages,
31 and such other relief as deemed just, proper and necessary by
32 the Court.

1 NINETEENTH CAUSE OF ACTION

2 I

3 Plaintiff does hereby incorporate and adopt by reference,
4 all allegations set forth in JURISDICTION (page 2); Title 28 USC
5 §1343, §1346(b); 42 USC 1981 et seq.; Constitutional Amendment XIV.

6 II

7 Plaintiff does hereby incorporate and adopt by reference,
8 all allegations set forth in all causes of action herein complain-
9 ed of for loss of privileges and immunities under color of authority

10 III

11 Plaintiff is a citizen of the United States, and the amount
12 in controversy exceeds ten thousand dollars, U.S. a party.

13 IV

14 Plaintiff does not know the true names and capacities of de-
15 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
16 therefore sues these defendants, and each of them, by such ficti-
17 tious names for damages caused and proximately caused to plaintiff.

18 V

19 On August 27, 1976, defendant SACRAMENTO MUNICIPAL UTILITY
20 DISTRICT (SMUD), employee JACK DEBOISE, was sent to restore
21 earlier unlawfully and illegally discontinued service to business
22 property, said service having been illegally discontinued in
23 retaliation against plaintiff for plaintiff's having filed this
24 lawsuit before this Court. When plaintiff demanded why the ser-
25 vice had been wrongfully discontinued when there was no outstand-
26 ing charge owed to defendant SMUD, defendant SMUD's agent and em-
27 ployee, without cause or provocation,
28 ployee/threatened plaintiff and started swinging his fist at plain-
29 tiff. When defendant's employee was a witness, defendant's em-
30 ployee dropped his fist, stopped his swing at plaintiff, turned
31 on the illegally disconnected service, and left.

Ronald Reagan-2793

32 VI

That defendants, and each of them, knowingly and willfully

1 organized and caused to be organized conspiracy and agreement among
2 themselves, and each of them, and with others, to suppress and
3 wrongfully withhold from law enforcement plaintiff's new life-
4 saving firearms and related technologies by illegally assaulting
5 plaintiff, and depriving him of guaranteed immunities from harm.

6 VII

7 That defendants, and each of them, did the acts and things
8 herein alleged pursuant to, and in furtherance of, the conspiracy
9 and agreement herein alleged, and hereinafter and hereinbefore
10 complained of, and under color of authority and pretense of law.

11 VIII

12 By reason of the wrongful, intentional, and malicious acts
13 of defendants, and each of them, and the fright thereby caused
14 plaintiff, plaintiff has suffered extreme and severe mental an-
15 guish and physical pain, and has been injured in mind and body
16 and earning capacity, the nature and extent of which shall be
17 proved at trial, and as incorporated herein under DAMAGES from
18 page 274.

19 IX

20 WHEREFORE, plaintiff demands judgment against defendants,
21 and each of them, compensatory and punitive damages, to be proved
22 at trial, and such relief as deemed proper and just by the Court.

23 TWENTIETH CAUSE OF ACTION

24 I

25 Plaintiff does hereby incorporate and adopt by reference,
26 all allegations set forth in JURISDICTION (page 2); Title 28 USC
§1343,
27 §1346(b); 42 USC §1981 et seq.; Constitutional Amendment XIV.

28 Ronald Reagan-2794

29 II

30 Plaintiff does hereby incorporate and adopt by reference,
31 all allegations set forth in all causes of action herein complained
32 of for loss of privileges and immunities under color of authority
and pretense of law, especially the TWENTY-FIRST CAUSE OF ACTION.

1 III

2 Plaintiff is a citizen of the United States, and corrupt
3 practices, Federal Election Campaign Act of 1971, as amended.

4 IV

5 Plaintiff does not know the true names and capacities of de-
6 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
7 therefore sues these defendants, and each of them, by such ficti-
8 tious names for damages caused and proximately caused to plaintiff.

9 V

10 In July 1976, defendants STATE OF CALIFORNIA, GOVERNOR EDMUND
11 G. BROWN, JR., and gubernatorial assistant MARC POCHE, wrongfully,
12 unlawfully, intentionally, maliciously, disregarded their duty to-
13 ward plaintiff when plaintiff attempted to communicate criminal
14 acts occurring in the State of California./ defendant MARC POCHE,
15 in GOVERNOR BROWN's presence, to plaintiff's information and be-
16 lief, threatened plaintiff in a hard ex-U.S. Marine voice: "Get
17 off this phone - everything will be taken care of". Then plain-
18 tiff BRONSON knew that under the color of authority and pretense
19 of law, defendants BROWN and POCHE meant to shortly and immediate-
20 ly send more STATE POLICE OFFICER, AGENTS or EMPLOYEES, or others,
21 to beat, maim, harass, assault, attempt to kill, silence, severely
22 threaten plaintiff and his personal safety. Plaintiff contin-
23 ues to live in fear, alarm and apprehension of bodily harm at the
24 hands of defendant STATE OF CALIFORNIA, or others, under color of
25 authority or pretense of law, to get Def. BROWN elected President.

26 Ronald Reagan-2795

VI

27 That defendants, and each of them, knowingly and willfully
28 organized and caused to be organized conspiracy and agreement
29 among themselves, and each of them, and with others, to suppress
30 and wrongfully withhold from law enforcement plaintiff's new life-
31 saving firearms and related technologies by illegally assaulting
32 plaintiff, and to suppress defendant GOVERNOR BROWN's coverup of

1 crimes committed in California and in the BROWN ADMINISTRATION, of
2 which plaintiff was knowledgeable, to get BROWN elected President.

3 VII

4 That defendants, and each of them, did the acts and things
5 herein alleged pursuant to, and in furtherance of, the conspiracy
6 and agreement herein alleged, and hereinafter and hereinbefore
7 complained of, under color of authority and pretense of law.

8 VIII

9 By reason of the wrongful, intentional, and malicious acts
10 of defendants, and each of them, and others, and the fright there-
11 by caused plaintiff, plaintiff has suffered extreme and severe
12 mental anguish and physical pain, and has been injured in mind and
13 body and earning capacity, the nature and extent of which shall be
14 proved at trial, and as incorporated herein under DAMAGES from
15 page 274.

16 IX

17 WHEREFORE, plaintiff demands judgment against defendants,
18 and each of them, compensatory and punitive damages, to be proved
19 at trial, and such other relief as deemed just and proper by Court.

20 TWENTY-FIRST CAUSE OF ACTION

21 I

22 Plaintiff does hereby incorporate and adopt by reference,
23 all allegations set forth in JURISDICTION (page 2); Title 28 USC
24 §1343,
§1346(b); 42 USC §1981 et seq; Constitutional Amendment XIV.

Ronald Reagan-2796

25 II

26 Plaintiff does hereby incorporate and adopt by reference,
27 all allegations set forth in all causes of action complained of
28 herein for deprivations of privileges and immunities under color of
29 law.

30 III

31 plaintiff is a citizen of the United States, and the amount
32 in controversy exceeds ten thousand dollars.

1 IV

2 Plaintiff does not know the true names and capacities of de-
3 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
4 therefore sues these defendants, and each of them, by such ficti-
5 tious names for damages caused and proximately caused to plaintiff.

6 V

7 Defendants are:

8 1. Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr.
9 State Capitol, Sacramento, California.

10 2. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J.
11 YOUNGER, 555 Capitol Mall, Sacramento, California.

12 3. Def. MARC POCHE, gubernatorial assistant, Office of the
13 Governor, State Capitol, Sacramento, California.

14 4. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF
15 GUY R. OATES, State Capitol, Sacramento, California.

16 5. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE OFFICER
17 L.D. SHERWOOD (BADGE NO. 4), State Capitol, Sacramento, California.

18 6. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE OFFICER
19 S.W. WESTON, State Capitol, Sacramento, California.

20 7. Other defendants present and not known to plaintiff.

21 Ronald Reagan-2797

22 VI

23 On February 11, 1977, defendants STATE OF CALIFORNIA, GOVERN-
24 OR EDMUND G. BROWN, JR., MARC POCHE, ATTORNEY GENERAL EVELLE J.
25 YOUNGER, CALIFORNIA STATE POLICE CHIEF GUY R. OATES, and others,
26 without cause or provocation, retaliated against plaintiff for
27 filing this lawsuit before this Court, and instituted and com-
28 pleted defendant MARC POCHE's threats of bodily harm toward plain-
29 tiff. Said defendants, and each of them, wrongfully, unlawfully,
30 maliciously, and contemptuously, under color of authority and pre-
31 tense of law, used defendants armed CALIFORNIA STATE POLICE OFFI-
32 CERS L.D. SHERWOOD (BADGE NO. 4) and S.W. WESTON, and others not
known to plaintiff, to deprive plaintiff and others of privileges

1 and immunities guaranteed to plaintiff as a citizen of the United
2 States, by Amendments I, IV, V, VII, and XIV of the Constitution of
3 the United States, and the Due Process and Equal Protection Claus-
4 es of the Fourteenth Amendment. Defendants, and each of them,
5 interfered with party to this Court proceeding by assaulting
6 plaintiff and others while plaintiff lawfully attended a Cali-
7 fornia administrative hearing at 1006 Fourth Street, Sacramento,
8 California. Said defendants, and each of them, in contempt for
9 judicial and administrative proceedings and parties, "dogged",
10 followed, stalked, obstructed, harassed, abused, assaulted, and
11 otherwise wrongfully pursued plaintiff and others with deadly
12 weapons, preventing plaintiff and others from peaceful lawful
13 assembly, presence and attendance at said administrative hearing.
14 Plaintiff and others were deprived of their rights and not per-
15 mitted to conduct business affairs before the administrative
16 hearing as plaintiff intended and as provided by law. The pre-
17 venting of plaintiff to conduct business before the administrative
18 hearing occurred wrongfully under color of authority and pretense
19 of law by defendants.

Ronald Reagan-2798

VII

21 The defendants, and each of them, knowingly and willfully
22 organized and caused to be organized conspiracy and agreement
23 amongst themselves, and each of them, and with others, to suppress
24 and wrongfully withhold from law enforcement plaintiff's new life-
25 saving firearms and related technologies, to suppress, wrongfully
26 silence, and wrongfully retaliate against plaintiff for filing
27 complaint before this Court, to suppress and wrongfully cover-up
28 GOVERNOR BROWN's wrongful cover-up of crimes committed in Cali-
29 fornia and scandals in the Brown Administration of which plain-
30 tiff is knowledgeable, and for other motives which shall be demon-
31 strated at trial, by illegally assaulting and threatening plain-
32 tiff.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and others, and the wounds and fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and compensatory damages and punitive damages, and such other relief as deemed just and proper by this Court.

TWENTY-SECOND CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, allegations set forth in JURISDICTION (page 2); 28 USC §§1343, 1346(b); 42 USC §1981 et seq; Constitutional Amendment XIV.

Ronald Reagan-2799

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action complained of herein for deprivations of privileges and immunities under color of law.

III

Plaintiff is a citizen of the United States; amount in con-

troversy exceeds Ten Thousand Dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

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V

Defendants are:

1. Def. STATE OF CALIFORNIA, CALIFORNIA ATTORNEY GENERAL
EVELLE J. YOUNGER, 555 Capitol Mall, Sacramento, California.
2. Def. STATE OF CALIFORNIA, "MR. ALEXANDER, OFFICE OF THE
ATTORNEY GENERAL, 555 Capitol Mall, Sacramento, California.

VI

On or about January 23, 1975, defendant agent, employee, or servant, "MR. ALEXANDER", refused to log charges of criminal acts (illegal wiretapping, etc.) committed in California, but instead, under color of authority and pretense of law, without cause or provocation, defendant agent, employee or servant wrongfully, willfully, maliciously, and negligently threatened plaintiff with bodily harm. When plaintiff calmed down and shortly called the ATTORNEY GENERAL's OFFICE for "MR. ALEXANDER", plaintiff was advised that there was no such person in the OFFICE OF THE ATTORNEY GENERAL. Plaintiff was immediately fearful and apprehensive for his personal safety in that again defendant ATTORNEY GENERAL YOUNGER had his agents and employees out after plaintiff. As defendants intended, and each of them, plaintiff was quite ill for some days after. Defendants prevented plaintiff from filing his charges.

VII

That from 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting plaintiff.

Ronald Reagan-2801

VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore

1 complained of, acting under color of authority and pretense of
2 law, and invaded plaintiff's guaranteed privileges and immunities.

3
4 IX

5 By reason of the wrongful, intentional, willful and malicious
6 acts and conspiracies of defendants, and each of them, and the
7 fright thereby caused plaintiff, plaintiff has suffered extreme
8 and severe mental anguish and physical pain, and has been injured
9 in mind and body and earning capacity, the nature and extent of
10 which shall be proved at trial, and as incorporated herein under
11 DAMAGES from page 274.

12 X

13 WHEREFORE, plaintiff demands judgment against defendants,
14 and each of them, the sum and costs of which shall be proved at
15 trial, and compensatory and punitive damages, and such other re-
16 lief as deemed just and proper by the Court.

17 TWENTY-THIRD CAUSE OF ACTION

18 I

19 Plaintiff does hereby incorporate and adopt by reference,
20 all allegations set forth in JURISDICTION (page 2); 28 USC §§
21 1343, 1346(b); 42 USC §1981 et seq; Constitutional Amendment XIV.

22 II

23 Plaintiff does hereby incorporate and adopt by reference,
24 all allegations set forth in all causes of action complained of
25 herein for deprivations of privileges and immunities under color
26 of law.

Ronald Reagan-2802

27 III

28 Plaintiff is a citizen of the United States, and the amount
29 in controversy exceeds Ten Thousand Dollars.

30 IV

31 Plaintiff does not know the true names and capacities of de-
32 fendants sued herein as JOHN DOE ONE THROUGH ONE HUNDRED, and
therefore sues these defendants, and each of them, by such ficti-

1 tious names for damages caused and proximately caused to plaintiff.

2 v

3 Defendants are:

4 1. Def. CITY OF SACRAMENTO, City Hall, 915 I Street,
5 Sacramento, California.

6 2. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE DEPARTMENT,
7 and CHIEF WILLIAM J. KINNEY, 813 Sixth St., Sacramento, California.

8 3. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE DEPARTMENT,
9 and INTELLIGENCE UNIT OFFICER SMITH, 813 6th St., Sacramento.

10 VI

11 On July 25, 1972, plaintiff filed particulars on criminal
12 acts occurring in the CITY OF SACRAMENTO with defendant, its a-
13 gent, employee or servant, POLICE OFFICER SMITH acting within the
14 scope of his employment. Defendant SMITH deceived plaintiff and
15 plaintiff did believe that defendant SMITH was requiring request-
16 ed information and particulars to complete official CITY OF SAC-
17 RAMENTO POLICE DEPARTMENT forms regarding the commission of crimes.
18 Defendant SMITH misquoted and misstated plaintiff's statements
19 which, uncorrected, would subject plaintiff to prejudice and loss
20 of respect in plaintiff's business activities and among plain-
21 tiff's business associates and clients. Plaintiff immediately
22 objected and demanded correction of the prejudicial and false
23 statements and information. Defendant's agent, employee or ser-
24 vant SMITH willfully, intentionally, wrongfully, and maliciously
25 refused to correct the prejudicial and false statements and infor-
26 mation, and defendant SMITH further refused to not publish and
27 communicate the prejudicial and false statements and information
28 to other law enforcement agencies and officials in California and
29 elsewhere in the United States, first by teletype followed by
30 written and published reports.

Ronald Reagan-2803

31 VII

32 Defendant, or by its agents, employees or servants acting

1 within the scope of their employment, intentionally, maliciously,
2 and willfully widely circulated and published to the law enforce-
3 ment communities of the United States and California deliberately
4 misstated and misquoted and erroneous and false statements about
5 plaintiff which defamed plaintiff's business reputation and pro-
6 fessional regard.

7 VIII

8 That the words spoken, written, published, circulated by de-
9 fendant or its agents, employees or servants, acting within the
10 scope of their employment, under color of authority and pretense
11 of law, without cause or provocation, were false and prejudicial,
12 and that prior to defendant's acts plaintiff enjoyed an excellent
13 and knowledgeable reputation in the firearms field and related
14 technologies. Defendant's acts caused plaintiff to be deprived by
15 the law enforcement community the benefits of plaintiff's firearms
16 ability/ ⁱⁿ plaintiff's United States Patent No. 3,543,428, "Rifle
17 Forestock", and "ANCHOR INTERNATIONAL WEAPONS TRAINING FIRING
18 MANUAL AND BRONSON STRINGFIRE METHOD", plaintiff's 1972 copyright
19 property.

Ronald Reagan-2804

20 IX

21 That defendant, contriving and intending to injure plaintiff
22 and deprive him of the respect, confidence and esteem peculiarly
23 essential to plaintiff's profession and business, and contriving
24 and intending to deprive plaintiff of his good business name,
25 reputation and the esteem of his business associates and clients,
26 and to bring plaintiff into disastrous scandal, ridicule, and pro-
27 fessional disrepute, before his clients, business associates, pro-
28 fessional associates, friends, neighbors, acquaintances, and the
29 public in general, and did hold plaintiff up to public scorn,
30 contempt, ridicule and disgrace, on or about July 25, 1972 for-
31 ward, by the false, scandalous, defatory libel, and wrongfully
32 published and circulated statements and information.

VIII

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new life-saving firearms and related technologies by illegally libeling and slandering plaintiff.

IX

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

X

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and others, plaintiff has been greatly injured in his good business name, fame and reputation, in the conduct and execution of his lawful business activities, in his standing in the community wherein plaintiff conducts his business, and in the high regard, respect, confidence and esteem he has hitherto enjoyed among his business associates and members of the law enforcement community and elsewhere,

XI

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and with others, and the libel and slander thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

Ronald Reagan-2805

XII

WHEREFORE, plaintiff demands judgment against the defendants compensatory and punitive damages, as shall be proved at trial.

1 TWENTY-FOURTH CAUSE OF ACTION

2 I

3 The Court has jurisdiction in this matter under Title 28,
4 United States Code, Secs. 1343, 1346(b), 2671 etseq., for depri-
5 vation of civil rights, assaults by federal police officers acting
6 under color of authority and pretense of law, the enjoinder of
7 unconstitutional actions of state officials, for damages under the
8 Federal Tort Claims Act; controversies to which the United States
9 is a party, United States Constitution, Article III, Section 2;
10 Title 42 United States Code Secs. 1981 et seq., particularly §§
11 1982, 1983, 1985, 1986, interference with Civil Rights; redress for
12 violations of the FIRST, FOURTH, and SIXTH Amendments, and the
13 Due Process and Equal Protection Clauses of the FOURTEENTH Amend-
14 ment to the United States Constitution, Title 28, United States
15 Code, Secs. 1331 et seq.

16 II

17 Further, jurisdiction of the Court is invoked under Title
18 28, United States Code, Secs. 1331 and 1343, this being a suit in
19 equity authorized by law; Title 42, United States Code, Sec. 1983,
20 to be commenced by any citizens of the United States or other per-
21 son within the jurisdiction thereof to redress the deprivation
22 under color of statute, ordinance, regulation, custom or usage
23 of a State of rights, privileges, and immunities secured by the
24 Constitution and Laws of the United States. The rights, privi-
25 leges, and immunities sought herein to be redressed are those
26 secured by the First Amendment, and the Due Process and Equal Pro-
27 tection Clauses of the Fourteenth Amendment to the United States
28 Constitution. The matter in controversy, exclusive of interest
29 and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

30 Ronald Reagan-2806
 III-A

31 Further, jurisdiction of the Court is invoked because acts of
32 defendants, under color of law and authority, deprived plaintiff

IV

Plaintiff is a citizen of the United States and the UNITED STATES is a party to this controversy.

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Defendants are:

1. Def. FEDERAL BUREAU OF INVESTIGATION (FBI), headquarters in Washington, D.C.

2. Def. FEDERAL BUREAU OF INVESTIGATION, FBI DIRECTOR WILLIAM RUCKELSHAUS, Washington, D.C.

3. Def. UNITED STATES OF AMERICA.

VIII

On May 22, 1973, defendant, its agent, employee or servant FBI DIRECTOR WILLIAM J. RUCKELSHAUS, under color of authority and pretense of law, intentionally, willfully, and maliciously sent a false and prejudicial letter to New York United States Senator James L. Buckley which subjected plaintiff to prejudice and loss of respect in the eyes of a fellow Yale Man.

Ronald Reagan-2807

IX

The defendant, contriving and intending to injure plaintiff and deprive him of the respect, confidence and esteem peculiarly essential to plaintiff's business profession and expertise, and contriving and intending to deprive plaintiff of his good business name, reputation and the esteem of his business associates and clients, and to bring plaintiff into disastrous scandal, ridicule, and professional disrepute, before his clients, professional

1 and business associates, friends, neighbors, acquaintances, and
2 the public in general, and to hold plaintiff up to public scorn,
3 contempt, ridicule and disgrace, did heretofore, on or about the
4 day of May 22, 1973, falsely and wrongfully publish and circulate
5 of and concerning the plaintiff, the following false, scandalous
6 and defamatory libel:

7 (1) "Mr. Bronson is a self-described designer-inventor who
8 claims to have developed a weapons training and firing system
9 which will vastly improve the user's accuracy."

10 (2) "Mr. Bronson's manual has been reviewed by the FBI
11 Academy firearms staff, and was found to contain no additional
12 knowledge or technology to that already in use in our firearms
13 program."

14 (3) "For some unknown reason, he (plaintiff BRONSON) select-
15 ed former Acting Director Gray as one of the individuals most
16 responsible for law enforcement's lack of interest in his (BRON-
17 SON) system."

18 (4) "In recent weeks, Mr. Bronson has made two telephone
19 calls to FBI Headquarters, Washington, D.C. On both occasions,
20 Mr. Bronson terminated his telephone calls with abusive and ob-
21 scene remarks when he was told the FBI had made no effort to sup-
22 press his technology." Ronald Reagan-2808

23 The foregoing was meant and intended to convey that plaintiff
24 BRONSON was to be suppressed and deprived the benefits of plain-
25 tiff's firearms ability and expertise, as embodied in United
26 States Patent No. 3,543,428, "Rifle Forestock", and plaintiff's
27 1972 copyright "ANCHOR INTERNATIONAL WEAPONS TRAINING FIRING
28 MANUAL AND BRONSON STRINGFIRE METHOD", by the law enforcement com-
29 munity and starting with defendant FBI, and to hold plaintiff in
30 contempt in the eyes of his business associates and clients he
31 worked with in a professional capacity. The foregoing wrongful
32 act was meant to direct attention to plaintiff away from defen-

dant(s)'s wrongful, malicious acts under color of authority or law.

X

That the words spoken, written, published, circulated by defendant or its agents, employees or servants, acting within the scope of their employment, under color of authority and pretense of law, without cause or provocation, were false and prejudicial, and that prior to defendant's acts plaintiff enjoyed an excellent and knowledgeable reputation in the firearms field and related technologies.

XI

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from lawenforcement plaintiff's new life-saving firearms and related technologies by illegally libeling and slandering plaintiff.

XII

That defendants, and each of them, did the acts, conspiracies and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

XIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and with others, plaintiff has been greatly injured in his good business name, fame and reputation, in the conduct and execution of his lawful business activities, in his standing in the community wherein plaintiff conducts his business, and in the high regard, respect, confidence and esteem he has hitherto enjoyed among his business and professional associates and members of the law enforcement and sport shooting communities and elsewhere.

Ronald Reagan-2809

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XIV

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By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and with others, and the libel and slander thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

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XV

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14

WHEREFORE, plaintiff demands judgment against the defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

15

TWENTY-FIFTH CAUSE OF ACTION

16

I

17

18

19

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 U.S.C. §§1343, 1346(b); 42 U.S.C. §1981 et seq.; Constitution Amend. XIV.

20

II

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22

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24

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action, herein, hereinbefore and hereinafter complained of for loss of privileges and immunities under color of authority and pretense of law.

25

III

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28

Plaintiff is a citizen of the United States, the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

Ronald Reagan-2810

29

IV

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31

32

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such ficti-

ticous names for damages caused and proximately caused to plaintiff.

V

Defendants are:

1. Def. UNITED STATES ARMY, headquarters The Pentagon, Washington, D.C., for the Aberdeen Proving Grounds, Aberdeen, Maryland, and elsewhere.

2. Def. WINCHESTER-WESTERN DIVISION of the OLIN CORPORATION, Stamford, Connecticut.

3. Def. REMINGTON ARMS DIVISION of the DUPONT DE NEMOURS CORPORATION, Wilmington, Delaware.

4. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTORS L.P. GRAY, WILLIAM RUCKELSHAUS, CLARENCE M. KELLEY, headquarters Washington, D.C.

5. Def. NATIONAL RIFLE ASSOCIATION of AMERICA, 1600 Rhode Island Avenue, N.W., Washington, D.C.

6. Def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION of the UNITED STATES DEPARTMENT OF JUSTICE, headquarters Washington, D.C.

7. Def. INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, INC., headquarters 11 Firstfield Road, Gaithersburg, Maryland.

8. Def. NATIONAL SHERIFFS ASSOCIATION, 1250 Connecticut Avenue, N.W., Washington, D.C., headquarters.

9. Defs. NIXON ADMINISTRATION WHITE HOUSE OFFICIALS, 1600 Pennsylvania Avenue, Washington, D.C.

10. Def. COLT INDUSTRIES, INC., headquarters New York City.

11. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER and GOVERNOR RONALD REAGAN, State Capitol, Sacramento, CA.

12. Def. LOS ANGELES COUNTY, SHERIFF PETER PITCHESS, 211 West Temple, Los Angeles, California 90012.

13. Def. SACRAMENTO COUNTY, SHERIFF DUANE LOWE, DISTRICT ATTORNEY JOHN PRICE, 720 - 9th Street, Sacramento, California.

14. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE, CHIEF WILLIAM J. KINNEY,

Ronald Reagan-2811

1 15. Def. FEDERAL PROTECTIVE SERVICE, OFFICERS CHASTAINE,
2 CLEMONS and SNELSON, Sacramento, California.

3 16. Def. STATE OF CALIFORNIA, CALIFORNIA HIGHWAY PATROL,
4 COMMISSIONER GLENDON B. CRAIG, headquarters Sacramento, California.

5 17. Def. STATE OF CALIFORNIA, STATE POLICE, OFFICERS WESTON
6 and SHERWOOD, CHIEF GUY R. OATES, headquarters Sacramento, CA.

7 18. Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr.,
8 MARC POCHE, State Capitol, Sacramento, California.

9 19. Def. CITY OF LOS ANGELES, LOS ANGELES POLICE DEPARTMENT,
10 CHIEF EDWARD DAVIS, 150 North Los Angeles, Los Angeles, CA 90012.

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Ronald Reagan-2812

VI

1
2 Beginning about 1971, and continuing to present time, defen-
3 dant UNITED STATES ARMY performed incorrect testing and analysis
4 of Plaintiff BRONSON's United States Patent No. 3,543,428, "Rifle
5 Forestock", and related firearms technologies. Defendant ARMY re-
6 fused to retest said technologies of plaintiff and correct defen-
7 dant ARMY's verbal and written reports of false findings. These
8 wrongful acts and other things done by defendant ARMY are more
9 fully set forth herein in plaintiff's 72nd through 75th causes/act.
10 relating to defendant(s), and each of them, anti-trust conspira-
11 cies and other wrongful acts.

VII

12
13 Beginning in and about 1971, and continuing to present, in
14 doing the above-mentioned conspiracies, acts and things herein,
15 hereinafter and hereinbefore complained of, defendant UNITED STATES
16 ARMY instigated and entered into conspiracies against plaintiff,
17 the results of which are:

18 1. That def. ARMY deliberately released said false reports
19 of plaintiff's technologies and United States Patent to the fire-
20 arms and related industries, and the public in general; that def.
21 ARMY refused to retest and correct said false reports; that def.
22 ARMY's illegal and wrongful acts were to coverup the inferior def.
23 ARMY's weaponry in the M-16 automatic rifle, the infantry rifle of
24 the Vietnam War.

25 2. That in exchange for coverup of inferior federal (ARMY)
26 weaponry, federal contracts, "add-on" contracts, and other "con-
27 siderations", defendants ARMY, WINCHESTER, REMINGTON, COLT, and
28 each of them, and with others, and THE ITHACA CORPORATION,
29 permit plaintiff with his firearms and related technologies to
30 engage in or compete in interstate commerce against defendant(s)
31 to date.
32

Ronald Reagan-2813

1 3. That in exchange for coverup of inferior def. FEDERAL
2 BUREAU OF INVESTIGATION pistol technology, inferior def. SECRET
3 SERVICE pistol technology, inferior def(s) NRA, IACP, and NSA pis-
4 tol technologies, and for special "considerations" from the law
5 enforcement communities and officials of the NIXON ADMINISTRATION,
6 defendant(s) ARMY, FBI, SECRET SERVICE, NRA, IACP, NSA, LOS ANGE-
7 LES POLICE AND SHERIFF DEPARTMENTS, SACRAMENTO POLICE AND SHERIFF
8 DEPARTMENTS, and each of them, and with others, conspired and act-
9 ed and did not permit plaintiff to compete/in interstate commerce
10 against defendant(s); that plaintiff was removed from competition
11 by defendant(s) conspiring and using beatings, strangulation, hand-
12 cuffing, assault, false imprisonment, false arrest, involuntary
13 restraint, trespass, attempted murder, sabotage of business
14 equipment, illegal wiretap, interference with delivery of U.S.
15 mail and other services, unlawful search and seizure, deprivation
16 of Civil Rights under color of authority and pretense of law, and
17 other wrongful conspiracies, acts and things herein complained of;
18 that the said conspiratorial campaign and patterns of harassment
19 and abuse of plaintiff were intended to and did not permit plain-
20 tiff to demonstrate that plaintiff's "STRINGFIRE" technology pro-
21 tects innocent citizens from wild, random gunfire by police, as
22 well as protecting law officers lives against felons, and to better
23 protect citizens by allowing law officers to stop felons from
24 wrongdoing by precise control firearms handling; that defendants,
25 and each of them, did together refuse to comment upon, fairly
26 evaluate, or fairly consider plaintiff's new lifesaving law en-
27 forcement and military technologies.

28 4. That inexchange for coverup of inferior federal (ARMY)
29 weaponry, federal contracts, "add-on" contracts, and other "con-
30 siderations", defendants WINCHESTER, REMINGTON, COLT, and others,
31 suppressed competition from Plaintiff BRONSON's more superior and
32 effective and efficient "rifle forestock" in threats against

1 plaintiff's potential clients, business associates, and firearms
2 manufacturers.

3 5. That in exchange for coverup of inferior federal (ARMY)
4 weaponry, federal contracts, "add-on" contracts, and other "con-
5 siderations", defendant(s) COLT, ARMY, and others, did suppress
6 from the American public the inferiority, inoperability, and in-
7 effectiveness of the UNITED STATES ARMY infantry automatic rifle,-
8 the M-16, the Vietnam rifle, from investigations by the United
9 States Congress and defendant(s) FEDERAL BUREAU OF INCESTIGATION.

10 6. That def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION, and
11 others, wrongfully used its funding to law enforcement authority
12 under Crime in the Streets Act of 1968 and the Omnibus Crime Bill
13 of 1968 to blackmail defendant(s) from not using plaintiff's fire-
14 arms and related technologies, by discriminating against the
15 American law enforcement communities and conspiratorily providing
16 wrongfully requested federal funds to law enforcement communities
17 in California, particularly in Sacramento and Los Angeles.

18 7. That defs. WINCHESTER WESTERN/OLIN, REMINGTON ARMS/DUPONT
19 and others, made illegal campaign contributions to Committee to
20 Relect the President (RICHARD M. NIXON), in exchange for which
21 officials of the NIXON WHITE HOUSE conspired and ordered plain-
22 tiff's firearms and related technologies suppressed through wrong-
23 ful, malicious, and intentional use of defendant(s) FBI, FBI DIR_
24 ECTORS GRAY AND RUCKELSHAUS AND KELLEY, THE SECRET SERVICE, LEAA,
25 and others, in illegal wiretapping and other wrongful acts and
26 things herein complained of; that plaintiff was the victim of
27 political blackmail and federal funding blackmail.'

28 8. That defendant(s) each in his own way conspired through
29 political and funding blackmail to effect def. STATE OF CALIFORNIA,
30 ATTORNEY GENERAL YOUNGER, GOVERNOR REAGAN and GOVERNOR BROWN, and
31 others, wrongful suppression of Plaintiff BRONSON and his fire-
32 arms and related technologies. Ronald Reagan-2815

1 9. That defendant(s) each in his own way conspired through
2 political and funding blackmail to effect defendant GOVERNOR ED-
3 MUND G. BROWN, Jr., wrongful suppression and abuse of plaintiff
4 by contributing to def. GOVERNOR BROWN's 1974 campaign for govern-
5 or of California, 1976 campaign for President of the United States,
6 and 1978 campaign for reelection to governor.

7 10. That defendants, and each of them, conspired and did
8 have def. FEDERAL PROTECTIVE SERVICE OFFICERS attack, beat, hand-
9 cuff, strangle, illegally search, seize, imprison, arrest, etc.,
10 plaintiff on August 22, 1975, without cause or provocation, under
11 color of authority and pretense of law, as more fully described
12 in plaintiff's FIRST through THIRD CAUSES OF ACTION.

13 11. That defendants, and each of them, conspired and did
14 have def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, OFFICERS
15 SHERWOOD AND WESTON, assault and threaten plaintiff with deadly
16 weapons on February 11, 1977, in retaliation for filing this law-
17 suit, in retaliation from def. GOV. BROWN, and others, for plain-
18 tiff's efforts to expose the criminal coverup by GOV. BROWN of
19 criminal acts in the Brown Administration, and as political pay-
20 off by def. GOVERNOR BROWN to defendant(s) in law enforcement,
21 and others, in which defendants, and each of them conspired to
22 support and contribute to the Brown Election Campaigns in return
23 for GOV. BROWN's continuing the assaults and harassments of plain-
24 tiff.

Ronald Reagan-2816

25 12. That defendants NATIONAL RIFLE ASSOCIATION, INTERNATION-
26 AL ASSOCIATION OF CHIEFS OF POLICE, NATIONAL SHERIFFS ASSOCIATION,
27 conspired with organization members and responded to plaintiff
28 unanimously in the negative or with obsenities, and dismissed
29 plaintiff's technologies without testing.

30 13. That defendants firearms manufacturers threatened to put
31 local retail gun dealers out of business by withdrawing firearms
32 "lines" if plaintiff's technologies were implemented or licensed.

VIII

The defendants, and each of them, conspired, contrived and intended to injure plaintiff and deprive him of the respect, confidence and esteem peculiarly essential to plaintiff's business profession and expertise, and said defendants conspired, contrived and intended to deprive plaintiff of the privileges and immunities guaranteed to plaintiff under Amendments I, IV, V, VI, VII, and XIV of the United States Constitution, and did deprive plaintiff of his good business name, reputation and esteem of his business associates and clients, and brought plaintiff into disastrous scandal, ridicule, and professional disrepute before his clients, professional and business associates, friends, neighbors, acquaintances, and the public in general, and held plaintiff up to public scorn, and did restrain plaintiff from being able to compete in interstate commerce and compete in the manufacture of, training in, and other things, related to firearms and other technologies, and did wrongfully publish and circulate false information regarding plaintiff and his technologies.

IX

That from 1971 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracies and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement and the military plaintiff's new lifesaving firearms and related technologies by illegally conspiring against and suppressing plaintiff.

Ronald Reagan-2817

X

That defendants, and each of them, did the conspiracies, acts and things herein, hereinafter and hereinbefore complained of, and in furtherance of, the conspiracy and agreement herein alleged and complained of, by defendant(s), its agents, employees or servants, acting within the scope of their employment, under color of

1 authority and pretense of law, without cause or provocation, and
2 intentionally invaded plaintiff's guaranteed protections, privi-
3 leges and immunities under Amendments I, IV, V, VI, VII, and XIV
4 of the United States Constitution.

5 XI

6 That defendants, and each of them, knowingly and willfully
7 organized and caused to be organized conspiracy and agreement
8 among themselves, and each of them, and with others, to suppress
9 and wrongfully withhold from law enforcement, NATO and the U.S.
10 military plaintiff's new lifesaving firearms and related technolo-
11 gies by illegally conspiring against and assaulting plaintiff.

12 XII

13 By reason of the wrongful, intentional, and malicious acts of
14 defendant(s), plaintiff has been greatly injured in his good busi-
15 ness name, fame and reputation, in the conduct and execution of
16 his lawful business activities, in his standing in the community
17 wherein plaintiff conducts his business, and in the high regard,
18 respect, confidence and esteem he has hitherto enjoyed among his
19 business and professional associates and members of the law enforce-
20 ment, military and sport shooting communities, and elsewhere.

21 XIII

22 By reason of the wrongful, intentional, and malicious acts of
23 defendant(s), and the wounds and fright thereby caused plaintiff,
24 plaintiff has suffered extreme and severe mental anguish and phys-
25 ical pain, and has been injured in mind and body and earning capa-
26 city, the nature and extent of which shall be proved at trial.

27 XIV

28 WHEREFORE, plaintiff demands judgment against the defendants,
29 and each of them, the nature, extent, sum and costs of which shall
30 be proved at trial, for compensatory and punitive damages and in-
31 corporated from page 274, and for such other relief as is deemed
32 just and proper by this Court.

Ronald Reagan-2818

TWENTY-SIXTH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.; Crime in the Streets Act and Omnibus Crime Bill, both of 1968; Federal Election Campaign Law of 1971.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III -A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

Ronald Reagan-2819

ORIGINAL

1 of the privileges and immunities guaranteed to plaintiff by
2 Amendments I, IV, V, VI, VII, and XIV of the Constitution of the
3 United States.

4 III - B

5 Plaintiff does hereby incorporate and adopt by reference,
6 all allegations set forth in JURISDICTION (page 2); Title 28,
7 USC, Sections 1343 and 1346(b); Title 42, USC, Section 1981 et
8 seq.; Amendments I, IV, V, VI, VII, and XIV to the United States
9 Constitution.

10 III - C

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action herein, herein-
13 after and hereinbefore complained of, for deprivations of privi-
14 leges and immunities under color of authority and pretense of
15 law.

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29 Ronald Reagan-2820
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3 IV

4 Plaintiff BRONSON is a citizen of the United States, the
5 UNITED STATES IS a party, and plaintiff incorporates herein all
6 causes of action hereinafter and hereinbefore complained of.

7 V

8 Plaintiff does not know the true names and capacities of de-
9 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
10 therefore sues these defendants, and each of them, by such ficti-
11 tious names for damages caused and proximately caused to plaintiff.

12 VI

13 Defendants are:

14 1. Def. UNITED STATES DEPARTMENT OF JUSTICE, UNITED STATES
15 ATTORNEY DWAYNE KEYES, 650 Capitol Mall, Sacramento, California.

16 2. Def. UNITED STATES DEPARTMENT OF JUSTICE, UNITED STATES
17 (ASSISTANT) ATTORNEY DONALD HELLER, 1220 H Street, Sacramento, CA.
18 Ronald Reagan-2821

19 Following the August 22, 1975, beating, strangulation, hand-
20 cuffing, false imprisonment, illegal search and seizure, etc., of
21 plaintiff wrongfully by defendant FEDERAL PROTECTIVE SERVICE, its
22 agents, employees, or servants, and more fully set forth in FIRST
23 THROUGH THIRD CAUSES OF ACTION herein, acting within scope of em-
24 ployment, under color of authority and pretense of law, without
25 cause or provocation, Plaintiff BRONSON immediately contacted the
26 Office of UNITED STATES ATTORNEY DWAYNE KEYES to file criminal
27 charges against said defendants, and each of them, in plaintiff's
28 lawful capacity of "complaining witness" for the United States of
29 America. That beginning with plaintiff's August 22, 1975, beat-
30 ing, etc., by defendant FPS, its agents, employees or servants,
31 extending through 1976, Plaintiff BRONSON's communications to
32 ASSISTANT U.S. ATTORNEY HELLER for U.S. ATTORNEY DWAYNE KEYES

1 were repeatedly refused by ASST. U.S. ATTORNEY HELLER in conspir-
2 acy with defendants, and each of them. ASST.U.S. ATTORNEY HELLER
3 repeatedly refused to receive complaint and filing of criminal
4 charges against defendant FPS, its, agents, employees, or servants,
5 by plaintiff, stating that plaintiff had to be represented by
6 "private attorney". Continuing the UNITED STATES conspiracy
7 against plaintiff, ASST. U.S. ATTORNEY HELLER continued to refuse
8 to permit filing of complaint and criminal charges against said
9 defendant(s) by plaintiff even after plaintiff BRONSON identified
10 himself as in propria persona exercising plaintiff's right of
11 "complaining witness" for the United States of America and did
12 not need a "private Attorney" to do so. Plaintiff had been in-
13 structed by federal official that there is no place for "private
14 attorney" in the United States Attorney's complaints and actions
15 for criminal wrongdoing. ASST. U.S. ATTORNEY HELLER wrongfully,
16 maliciously, negligently, wantonly, conspiringly, denied Plaintiff
17 BRONSON protections, privileges, and immunities guaranteed to
18 plaintiff under Amendments I, IV, V, VI, VII, and XIV of the United
19 States Constitution, and particularly the Equal Protection and
20 Due Process of Law Clauses of the Fourteenth Amendment. Plaintiff
21 never achieved filing of criminal complaint because of HELLER's
22 refusals to perform his duty.

Ronald Reagan-2822

VIII

24 That from 1975 forward, defendants, and each of them, know-
25 ingly and willfully organized and caused to be organized conspir-
26 acy and agreement among themselves, and each of them, and with
27 others, to suppress and wrongfully withhold from law enforcement
28 plaintiff's new lifesaving firearms and related technologies by
29 conspiring and covering up defendant FPS beating of plaintiff.

IX

31 That defendants, and each of them, did the acts and things
32 herein alleged pursuant to, and infurtherance of, the conspiracy

1 and agreement herein alleged, and hereinafter and hereinbefore
2 complained of, acting under color of authority and pretense of
3 law, and invaded plaintiff's guaranteed privileges and immunities.

4 X

5 By reason of the wrongful, intentional, willful and malicious
6 acts and conspiracies of defendants, and each of them, and the
7 fright thereby caused plaintiff, plaintiff has suffered extreme
8 and severe mental anguish and physical pain, and has been injured
9 in mind and body and earning capacity, the nature and extent of
10 which shall be proved at trial, and as incorporated herein under
11 DAMAGES from page 274.

12 XI

13 WHEREFORE, plaintiff demands judgment against defendants,
14 and each of them, the nature, extent, sum and costs of which
15 shall be proved at trial, and compensatory and punitive damages,
16 and such other relief as deemed just and proper by the Court.

17 TWENTY-SEVENTH CAUSE OF ACTION

18 I

19 Plaintiff does hereby incorporate and adopt by reference,
20 all allegations set forth in JURISDICTION (page 2); Title 28 USC
21 §§1343, 1346(b); 42 USC §1981 et seq.; Constitutional Amendment XIV.

22 II

23 Plaintiff does hereby incorporate and adopt by reference, all
24 allegations set forth in all causes of action herein, hereinbefore
25 and hereinafter complained of, for loss of privileges and immuni-
26 ties under color of authority and pretense of law.

27 III

28 Plaintiff is a citizen of the United States, the amount in
29 controversy exceeds Ten Thousand Dollars, and the UNITED STATES
30 is a party; jurisdiction arises/under Federal Election Campaign
Law of 1971, as amended. Ronald Reagan-2823

31 IV

32 Plaintiff does not know the true names and capacities of de-

1 defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
2 therefore sues these defendants, and each of them, by such ficti-
3 tious names for damages caused and proximately caused to plaintiff.

4 V

5 Defendants are:

6 1. Def. UNITED STATES, LAW ENFORCEMENT ASSISTANCE ADMINIS-
7 TRATION, headquarters Washington, D.C.

8 2. Def. STATE OF CALICORNIA, ATTORNEY GENERAL EVELLE J.
9 YOUNGER through the Office of Criminal Justice Planning, Sacramen.

10 3. Def. STATE OF CALIFORNIA, CALIFORNIA HIGHWAY PATROL,
11 headquarters Sacramento.

12 4. Def. COUNTY OF SACRAMENTO, SHERIFFS DEPARTMENT, SHERIFF
13 DUANE LOWE, 711 G Street, Sacramento, California.

14 5. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE DEPARTMENT,
15 CHIEF WILLIAM J. KINNEY, 813 - 6th Street, Sacramento, California.

16 6. Def. LOS ANGELES COUNTY, SHERIFFS DEPARTMENT, SHERIFF
17 PETER PITCHESS, 211 West Temple, Los Angeles, California.

18 7. Def. CITY OF LOS ANGELES, LOS ANGELES POLICE DEPARTMENT,
19 CHIEF EDWARD DAVIS, 150 North Los Angeles Street, Los Angeles,
20 California 90012.

21 8. Def. CITY OF LOS ANGELES, MAYOR THOMAS BRADLEY, City Hall,
22 200 North Spring Street, Los Angeles, California, 90012.

23 Ronald Reagan-2824

24 On or about 1972, defendants, and each of them, conspired
25 with def. LEAA, its agents, employees, or servants, and others,
26 and did accept federal law enforcement funding assistance, fun-
27 neled through the California Office of Criminal Justice Planning
28 and elsewhere, for not adopting, implementing or training in
29 Plaintiff's United States Patent No. 3,543,428, "Rifle Forestock",
30 and "ANCHOR INTERNATIONAL WEAPONS TRAINING FIRING MANUAL AND
31 BRONSON STRINGFIRE METHOD", and other related technologies. De-
32 fendants, and each of them, accepted the federal law enforcement

1 funding in the finance of this conspiracy, discriminating against
2 other law enforcement communities and desperate needs, and for
3 the political reasons, blackmail, advancement, funding and support
4 of ATTORNEY GENERAL YOUNGER's campaigns, LAPD CHIEF DAVIS's cam-
5 paing, GOVERNOR RONALD REAGAN's campaign, MAYOR THOMAS BRADLEY's
6 campaigns (former policeman), GOVERNOR BROWN's presidential and
7 reelection campaigns, and others. Defendant(s) maliciously, wrong-
8 fully and willfully did these acts and things herein complained
9 of to deprive plaintiff of his Patent and STRINGFIRE properties.
10 Defendant(s) at the same time breached their duty to fellow offi-
11 cers and placed their lives unnecessarily in danger and traitor-
12 ously spent the lives of several hundred police officers in Cali-
13 fornia in defendant(s) willful, malicious and wanton suppression
14 of plaintiff and his technologies. Defendants, and each of them,
15 sent back training manuals without comment, fair evaluation or
16 fair consideration of the new lifesaving weapons technologies.

17 VII

18 In doing the wrongful conspiracies, acts and things above-
19 mentioned, def. MAYOR BRADLEY ignored plaintiff's May 15, 1975,
20 and prior pleas for MAYOR BRADLEY investigation in the scope of
21 his employment of the conspiracy and federal funding blackmail
22 involving LAPD CHIEF EDWARD DAVIS. Plaintiff is not to write,
23 communicate, with any one in the CITY OF LOS ANGELES government
24 by order of MAYOR BRADLEY, as plaintiff was repeatedly advised.

25 VIII

26 Beginning in or about 1972, def. LEAA, its agents, employees
27 or servants, conspired to restrain and suppress plaintiff's fire-
28 arms and related technologies and described in sub-paragraphs VI
29 and VII above, and did: Ronald Reagan-2825

30 (1) Bribe, restrain, suppress and otherwise keep plaintiff
31 out of the firearms industry and weapons/sports training fields,
32 by use of "discriminatory" and unfair and unlawful federal funding.

1 (2) Bribe, restrain, suppress and otherwise keep plaintiff
2 out of the law enforcement and military weapons training field.

3 (3) Payoff to defs. WINCHESTER, REMINGTON, and COLT, and
4 others, directly and directly, for defendant(s) illegal election
5 campaign contributions to RICHARD M. NIXON and others, by wrong-
6 fully, willfully and maliciously eliminating competition to defs.
7 WINCHESTER, REMINGTON, COLT, and others, represented in Plaintiff
8 BRONSON and his firearms and related technologies.

9 (4) Material assist in the extended coverup of the inferior,
10 ineffective, inefficient, inoperative ARMY M-16 infantry rifle
11 which caused the unnecessary loss of thousands of lives of Ameri-
12 can servicemen and lost the Vietnam War for America.

13 (5) Bribe the California law enforcement community with
14 federal funding monies and "considerations" and other acts and
15 things herein complained of, in return for certain California law
16 enforcement community defendant(s) acting to not adopt, implement
17 or train in plaintiff's firearms and related technologies.

18 (6) Other acts and things which shall be proved at trial.

19 IX

20 That from 1972 forward, defendants, and each of them, know-
21 ingly and willfully organized and caused to be organized conspir-
22 acy and agreement among themselves, and each of them, and with
23 others, to suppress and wrongfully withhold from law enforcement
24 plaintiff's new lifesaving firearms and related technologies by
25 conspiring and covering up defendant(s) wrongdoing through federal
26 funding blackmail, bribes, payoffs, etc., which shall be proved
27 at trial.

Ronald Reagan-2826

28 X

29 That defendants, and each of them, did the acts and things
30 herein alleged pursuant to, and in furtherance of, the conspiracy
31 and agreement herein alleged, and hereinafter and ;hereinbefore
32 complained of, acting under color of authority and pretense of

1 law, and invaded plaintiff's guaranteed privileges and immunities
2 under Equal Protection and Due Process Clauses of Amendment XIV.

3 XI

4 By reason of the wrongful, intentional, willful and malicious
5 acts and conspiracies of defendants, and each of them, and the
6 fright thereby caused plaintiff, plaintiff has suffered extreme
7 and severe mental anguish and physical pain, and has been injured
8 in mind and body and earning capacity, the nature and extent of
9 which shall be proved at trial, and as incorporated herein under
10 DAMAGES from page 274.

11 XII

12 WHEREFORE, plaintiff demands judgment against defendants,
13 and each of them, the nature, extent, sum and costs of which
14 shall be proved at trial, and compensatory and punitive damages,
15 and such other relief as deemed just and proper by the Court.

16 TWENTY-EIGHTH CAUSE OF ACTION

17 I

18 Plaintiff does hereby incorporate and adopt by reference,
19 all allegations set forth in JURISDICTION (page 2); Title 28 of
20 the United States Code, Sections 1343, 1346(b); Title 42, United
21 States Code, Section 1981 et seq.; Fourteenth Amendment of the
22 Constitution of the United States; and Public Utilities Act.

23 II

24 Plaintiff does hereby incorporate and adopt by reference,
25 all allegations set forth in all causes of action herein, herein-
26 after and hereinbefore complained of for loss of privileges and
27 immunities under color of authority and pretense of law.

28 III

29 Plaintiff is a citizen of the United States, the UNITED
30 STATES is a party, and the amount in controversy exceeds, exclu-
31 sive of interest and costs, Ten Thousand Dollars.

32 Ronald Reagan-2827

1 IV

2 Plaintiff does not know the true names and capacities of de-
3 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
4 therefore sues these defendants, and each of them, by such ficti-
5 tious names for damages caused and proximately caused to plaintiff.

6 V

7 Defendants are:

8 1. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTORS L.P.
9 GRAY, WILLIAM RUCKELSHAUS, CLARENCE M. KELLEY, headquarters in
10 Washington, D.C.

11 2. Def. UNITED STATES SECRET SERVICE, headquarters, Washing-
12 ton, D.C.

13 3. Defs. NIXON ADMINISTRATION WHITE HOUSE OFFICIALS, 1600
14 Pennsylvania Avenue, N.W., Washington, D.C.

15 4. Def. WESTERN UNION TELEGRAPH COMPANY, headquarters at
16 60 Hudson Street, New York, NY 10013; Baltimore Area Office,
17 108 East Baltimore Street, Baltimore, MD 21202; Hagerstown, Md
18 branch office at 31 East Antietam Street, Hagerstown, MD 21740.

19 Ronald Reagan-2828

VI

20 On or about April 28, 1973, plaintiff paid for and sent a
21 telegraphic message, followed by letter, to defendant EXECUTIVE
22 OFFICES of the NIXON ADMINISTRATION. Plaintiff demanded that the
23 wrongful, malicious, willful, and unlawfull suppressions, harass-
24 ment, abuse, illegal wiretapping, etc., of plaintiff and his tech-
25 nologies by defendant(s), its agents, employees or servants, act-
26 ing under color of authority and pretense of law, stop immediately.
27 Further, plaintiff demanded that defendant UNITED STATES, its a-
28 gents, employees or servants coverup of defendant(s) wrongdoings
29 and wrongful acts toward plaintiff stop immediately. Further,
30 plaintiff demanded immediate retraction of defendant UNITED STATES,
31 U.S. DEPARTMENT OF JUSTICE, ASST. ATTORNEY GENERAL HENRY E. PETER-
32 SEN, October 20, 1972 letter which was false and a discrediting

1 of plaintiff and plaintiff's firearms and related technologies
2 in malicious, wanton and willful act by PERERSEN in the scope of
3 his employment under the control of defendant UNITED STATES, its
4 agents, employees or servants.

5 VII

6 Immediately thereafter, plaintiff was informed, and so relies
7 on, by def. WESTERN UNION, its agents, employees or servants, that
8 def. WESTERN UNION routed plaintiff's telegraphic message through
9 defendant's Baltimore (MD) Area Office then to its local office
10 in Hagerstown, Maryland. Def. WESTERN UNION, its agents, employ-
11 ees or servants, later denied this routing of plaintiff's message,
12 instead stating to plaintiff that def. WESTERN UNION never received
13 plaintiff's telegraphic message in Baltimore directly from Sacra-
14 mento, California. Further, def. WESTERN UNION stated it had no
15 record of plaintiff's telegraphic message. Def. WESTERN UNION,
16 its agents, employees or servants, conspired and collaborated
17 with defendant(s) FBI, SECRET SERVICE, NIXON ADMINISTRATION OFFI-
18 CIALS, and others, to suppress and destroy plaintiff's telegraph-
19 ic message in violation of the regulations of the Public Utilities
20 Act. Def. WESTERN UNION conspired to and did assist defendant(s)
21 FBI, SECRET SERVICE, NIXON ADMINISTRATION OFFICIALS, and others,
22 in covering up their illegal acts depriving plaintiff of his
23 guaranteed privileges, immunities and protections of Amendments
24 I, IV, V, VI, VII, and XIV of the United States Constitution. Plain-
25 tiff does not know what happened to plaintiff's telegraphic mes-
26 sage, and plaintiff continued, and continues to present, to be
27 abused, harassed, illegally wiretapped, etc., complained of here-
28 inbefore and hereinafter, by defendant UNITED STATES, its agents,
29 employees, or servants. Ronald Reagan-2829

30 VIII

31 That from 1973 forward, defendants, and each of them, know-
32 ingly and willfully organized and caused to be organized conspir-

1 acy and agreement herein alleged, and hereinafter and hereinbe-
2 fore complained of, acting under color of authority and pretense
3 of law, and invaded plaintiff's guaranteed privileges and immuni-
4 ties under Equal Protection and Due Process Clauses of Amendment
5 XIV of the United States Constitution, and the regulations of the
6 Public Utility Act.

7 IX

8 By reason of the wrongful, intentional, willful and malici-
9 ous acts and conspiracies of defendants, and each of them, and
10 the fright thereby caused plaintiff, plaintiff has suffered ex-
11 treme and severe mental anguish and physical pain, and has been
12 injured in mind and body and earning capacity, the nature and
13 extent of which shall be proved at trial, and as incorporated
14 herein under DAMAGES from page 274.

15 X

16 WHEREFORE, plaintiff demands judgment against defendants,
17 and each of them, the nature, extent, sum and costs of which
18 shall be proved at trial, and compensatory and punitive damages
19 and such other relief as deemed just and proper by the Court.

20 TWENTY-NINTH CAUSE OF ACTION

21 I.

22 Plaintiff does hereby ;incorporate and adopt by reference,
23 all allegations set forth in JURISDICTION (page 2); Title 28,
24 United States Code, Sections 1343, 1346(b); 42 USC §1981 et seq.;
25 and Fourteenth Amendment to the Constitution of the United States.
26 Ronald Reagan-2830

27 II

28 Plaintiff does hereby incorporate and adopt by reference, all
29 allegations set forth in all causes of action herein, hereinafter
30 and hereinbefore complained of for loss of privileges and immuni-
31 ties under color of authority and pretense of law.

32 III

Plaintiff is a citizen and the UNITED STATES IS A PARTY.

1 IV

2 Plaintiff does not know the true names and capacities of de-
3 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
4 therefore sues these defendants, and each of them, by such ficti-
5 tious names for damages caused and proximately caused to plaintiff.

6 V

7 Defendants are:

8 1. Def. UNITED STATES OF AMERICA, U.S. DEPARTMENT OF JUS-
9 TICE, ASSISTANT UNITED STATES ATTORNEY GENERAL HENRY E. PETERSEN,
10 headquarters Washington, D.C.

11 2. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTOR L. PATRICK
12 GRAY, headquarters Washington, D.C.

13 VI

14 On or about October 20, 1972, defendant, its agent, employee
15 or servant ASSISTANT UNITED STATES ATTORNEY GENERAL HENRY E. PE-
16 TERSEN, under color of authority and pretense of law, intention-
17 ally, willfully, and maliciously sent a false and prejudicial
18 letter to California United States Senator Alan Cranston which
19 falsely discredited plaintiff and subjected plaintiff to preju-
20 dice and loss of respect in the eyes of Senator Cranston.

21 Ronald Reagan-2831

22 VII

23 The defendant, contriving and intending to injure plaintiff
24 and deprive him of the respect, confidence and esteem peculiarly
25 essential to plaintiff's business profession and expertise, and
26 contriving and intending to deprive plaintiff of his good business
27 name, reputation and the esteem of his business and professional
28 associates and clients, and to bring plaintiff into disastrous
29 scandal, ridicule, and professional disrepute, before his clients,
30 professional and business associates, friends, neighbors, acquaint-
31 ances, and the public in general, and to hold plaintiff up to pub-
32 lic scorn, contempt, ridicule and disgrace, did heretofore, on or
about the day of October 20, 1972, falsely and wrongfully publish

1 and circulate of and concerning the plaintiff, the false, scandal-
2 ous and defamatory libel.

3 Plaintiff herein requests the indulgence of the Court
4 and petitions that plaintiff be allowed to amend this sub-para-
5 graph VII of plaintiff's TWENTY-NINTH CAUSE OF ACTION at a later
6 date to include the false, scandalous and defamatory libel in
7 letter not in plaintiff's possession, but in the possession of
8 United States Senator Alan Cranston and the United States Depart-
9 ment of Justice.

10 The foregoing described letter was meant and intended
11 to convey that plaintiff BRONSON was to be suppressed and deprived
12 the benefits of plaintiff's firearms ability and expertise, as em-
13 bodied in United States Patent No. 3,543,428, "Rifle Forestock",
14 and plaintiff's 1972 copyright "ANCHOR INTERNATIONAL WEAPONS
15 TRAINING FIRING MANUAL AND BRONSON STRINGFIRE METHOD", by the law
16 enforcement community and starting with defendant FBI, and to hold
17 plaintiff in contempt in the eyes of his business and professional
18 associates and clients he worked with in a professional capacity.
19 Further, the foregoing described letter was meant to turn the
20 eyes of the inquirer from defendant(s) and their wrongful acts
21 to the direction of plaintiff.

22 VIII

23 That the words spoken, written, published, circulated by de-
24 fendant or its agents, employees or servants, acting within the
25 scope of their employment, under color of authority and pretense
26 of law, without cause or provocation, were false and prejudicial,
27 and that prior to defendant's acts plaintiff enjoyed an excellent
28 and knowlegeable reputation in the firearms field and related
29 technologies.

Ronald Reagan-2832

30 IX

31 That defendants, and each of them, knowingly and willfully
32 organized and caused to be organized conspiracy and agreement

1 among themselves, and each of them, and with others, to suppress
2 and wrongfully withhold from law enforcement plaintiff's new
3 lifesaving firearms and related technologies by illegally libel-
4 ing and slandering, discrediting plaintiff.

5 X

6 That defendants, and each of them, did the acts, conspira-
7 cies and things herein alleged pursuant to, and in furtherance
8 of, the conspiracy and agreement herein alleged, and hereinafter
9 and hereinbefore complained of, under color of authority and pre-
10 tense of law.

11 XI

12 By reason of the wrongful, intentional, and malicious acts
13 of defendants, and each of them, and with others, plaintiff has
14 been greatly injured in his good business name, fame and reputa-
15 tion, in the conduct and execution of his lawful business activi-
16 ties, in his standing in the community wherein plaintiff con-
17 ducts his business, and in the high regard, respect, confidence
18 and esteem he has hitherto enjoyed among his business and pro-
19 fessional associates and members of the law enforcement and sport
20 shooting communities and elsewhere.

21 XII

22 By reason of the wrongful, intentional, and malicious acts
23 of defendants, and each of them, and with others, and the libel
24 and slander thereby caused plaintiff, plaintiff has suffered ex-
25 treme and severe mental anguish and physical pain, and has been
26 injured in mind and body and earning capacity, the nature and ex-
27 tent of which shall be proved at trial, and as incorporated here-
28 in under DAMAGES from page 274 Ronald Reagan-2833

29 XIII

30 WHEREFORE, plaintiff demands judgment against the defendants,
31 and each of them, the nature, extent, sum and costs of which shall
32 be proved at trial, and compensatory and punitive damages, and for

such other relief as deemed just and proper by the Court.

THIRTIETH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

Ronald Reagan-2834

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

ORIGINAL

1 of the privileges and immunities guaranteed to plaintiff by Amend-
2 ments I, IV, VI, VII, and XIV to the United States Constitution.

3 IV

4 Plaintiff BRONSON is a citizen of the United States, and the
5 amount in controversy exceeds Ten Thousand Dollars.

6 V

7 Plaintiff does not know the true names and capacities of de-
8 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
9 therefore sues these defendants, and each of them, by such ficti-
10 tious names for damages caused and proximately caused to plaintiff.

11 VI

12 Defendants are:

13 1. Def. FEDERAL PROTECTIVE SERVICE (FPS) of the UNITED STATES
14 GENERAL SERVICES ADMINISTRATION (GSA). Headquarters of the GSA
15 are Washington, D.C. Local headquarters of the FEDERAL PROTECTIVE
16 SERVICE (FPS) is 650 Capitol Mall, Sacramento, California.

17 2. Defs. OFFICER CLEMONS (BADGE 3327), OFFICER JAMES CHAS-
18 TAINE, and CLARENCE SNELSON, uniformed agents and employees of the
19 Sacramento FEDERAL PROTECTIVE SERVICE office.

20 3. Defs. OFFICER GREER and OFFICER W.W. SMITH (BADGE 30),
21 uniformed agents and employees of LUV SECURITY SERVICE, Sacramento,

22 4. Def. LUV SECURITY SERVICE, Sacramento, California, under
23 contract to the defendant FEDERAL PROTECTIVE SERVICE to perform
24 services as contracted. Represented in Sacramento, California
25 by attorney Michael Sands.

26 5. Defs. FEDERAL BUREAU OF INVESTIGATION and DIRECTOR L.
27 PATRICK GRAY, headquartered in Washington, D.C., with local ad-
28 dress of 2800 Cottage Way, Sacramento, California.

29 6. Def. "VICTOR MARTINEZ".

30 7. Other defendants not known to plaintiff.

31 Ronald Reagan-2835

32

ORIGINAL

VI -B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in ~~jurisdiction~~ (page 2); Title 23 of the United States Code, Sections 1343 and 1345(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV to the Constitution of the United States.

VI -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, herein-after and hereinafter complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

Ronald Reagan-2836

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V

That on August 22, 1975, in the County of Sacramento, State of California, defendants, under color of authority and pretense of law, and armed with deadly weapons, and each of them, maliciously, wantonly, willfully, recklessly, wrongfully, viciously, ^{without just cause or provocation, restrained,} and violently/ attacked, beat, strangled, handcuffed, illegally searched and seized, falsely arrested, falsely imprisoned, struck ^{head and} plaintiff in and about the/face, made other multiple physical abuses and injuries to plaintiff which required plaintiff to go to the hospital for care and treatment, violating the security in one's person, and I, IV, VI, VII and XIV U.S. Constitution Amendmts.

VI

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was wounded and has suffered bodily pain and discomfort, and has suffered great pain of mind and mental anguish and emotional distress. Plaintiff was not arrested.

VII

That all of the foregoing acts were done and committed and caused by defendants, and each of them, with malice and ill will and with the intent and design of injuring and oppressing plaintiff, and in conspiracy with others, and for that reason plaintiff is entitled to and asks for punitive or exemplary damages as will be demonstrated at trial, and as incorporated herein under DAMAGES from page 274

Ronald Reagan-2837

VIII

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was compelled to and did expend sums for medical care and the employment of physicians and surgeons; by virtue of which plaintiff has incurred debts in amounts to be demonstrated at trial, which sums were necessary, reasonable and proper.

IX

That by reason of the injuries inflicted upon plaintiff by

ORIGINAL

1 defendants, and each of them, plaintiff will continue to suffer
2 great pain and anguish of body and mind, all to plaintiff's dam-
3 age, the sum of which will be demonstrated at trial, and as in-
4 corporated herein under DAMAGES from page 274.

5 X

6 WHEREFORE, plaintiff demands judgment against defendants,
7 and each of them, and others, in the sum and costs to be demon-
8 strated at trial, and compensatory and punitive damages, and such
9 other relief as deemed just and proper by the Court.

10 THIRTY-FIRST CAUSE OF ACTION

11 I

12 Plaintiff does hereby incorporate and adopt by reference,
13 all allegations set forth in JURISDICTION (page 2); 28 USC §§1343,
14 1346(b); all causes of action herein, hereinafter, hereinbefore
15 complained of.

16 II

17 This Court has jurisdiction under Title 42, USC, Sec. 1981
18 et seq., and violations of Due Process and Equal Protection Clauses
19 of the Fourteenth Amendment to the U.S. Constitution.

20 III

21 Plaintiff is a citizen of the United States whose business
22 address is Post Office Box 588, Sacramento, California.

23 IV

24 Plaintiff believes defendant's name of "Victor Martinez" is
25 an alias, and so sues said "Victor Martinez" as a JOHN DOE-ONE
26 THROUGH ONE HUNDRED.

27 V

28 On August 22, 1975, at 801 I Street, Sacramento, California,
29 the Federal Post Office Building at 8th and I Streets, Sacramen-
30 to, defendant "Martinez" assaulted plaintiff/without cause or provocation by wrongfully, unlaw-
31 fully, intentionally, and menacingly tracking, following, "dog-
32 ging" plaintiff Eronson inside the U.S. Post Office, after many
months of menacingly tracking, following, "dogging" plaintiff

Ronald Reagan-2838

ORIGINAL

1 BRONSON outside the U.S. Post Office and throughout Sacramento
2 County. Each and every time defendant "MARTINEZ" was around
3 plaintiff, plaintiff was immediately alarmed and apprehensive
4 for his safety because of "MARTINEZ"'s concealed weapon on his
5 person. Plaintiff was constantly, fearfully, and warily shifting
6 his standing, sitting, walking, or driving positions in counter
7 movement to the malicious, wanton, willful or reckless disregard
8 for plaintiff's rights exhibited by one "MARTINEZ".

9 VI

10 On August 22, 1975, in the United States Post Office, 8th
11 and I Streets, Sacramento, defendant "MARTINEZ" appeared after
12 plaintiff, and plaintiff feared for his life right in the Post
13 Office by "MARTINEZ" gestures, walk, following, watching, of
14 plaintiff. Plaintiff was so alarmed, fearful and apprehensive
15 with the wrongful behavior of "MARTINEZ" in the Federal Building,
16 that plaintiff warned defendants UNITED STATES GOVERNMENT, FEDER-
17 AL PROTECTIVE SERVICE, LUV SECURITY SERVICE, FPS OFFICERS CLEMONS
18 AND CHASTAINE, and LUV OFFICERS GREER and W.W. SMITH that plain-
19 tiff intended to place said "MARTINEZ" under citizen's arrest
20 for harassment of plaintiff in the federal building.

21 VII

22 That on August 22, 1975, defendants, and each of them, know-
23 ingly and willfully organized and caused to be organized a new
24 conspiracy and agreement among themselves, and each of them, to
25 stop plaintiff BRONSON by forcible means from placing defendant
26 "MARTINEZ" under citizens arrest, or to stop plaintiff from
27 causing an arrest warrant to be issued for one "MARTINEZ", either
28 from federal or local agencies.

Ronald Reagan-2839

29 VIII

30 That on August 22, 1975, defendants FPS and LUV officers
31 did assault, beat, strangle, handcuff, illegally search and
32 seize, falsely arrest, falsely imprison, and make other multiple

ORIGINAL

1 without cause or provocation
physical abuses and injuries to plaintiff/under color of authority
2 and pretense of law, and armed with deadly weapons. Plaintiff
3 does hereby incorporate and adopt by reference all allegations
4 set forth in all causes of action herein, hereinbefore and here-
5 inafter complained of.

6 IX

7 That defendants, and each of them, did the acts and things
8 herein alleged pursuant to, and in furtherance of, the conspiracy
9 and agreement above alleged, and hereinafter and hereinbefore
10 complained of.

11 X

12 By reason of the wrongful, intentional, and malicious acts
13 of defendants, and each of them, and the fright and injuries
14 thereby caused plaintiff, plaintiff has suffered extreme and
15 severe mental anguish and physical pain, and has been injured in
16 mind and body and earning capacity, the nature and extent of which
17 shall be proved at trial, and as incorporated herein under DAMAGES
18 from page 274.

19 XI

20 WHEREFORE, Plaintiff demands judgment against defendants,
21 and each of them, the nature, extent, sum and costs of which
22 shall be demonstrated at trial.

23 THIRTY-SECOND CAUSE OF ACTION

24 I

25 Plaintiff does hereby incorporate and adopt by reference,
26 all allegations of jurisdiction set forth in JURISDICTION; 28 USC
27 §§1343, 1346(b); 42USC §1981 se seq.; Constitutional Amendment XIV.
Ronald Reagan-2840

28 II

29 Plaintiff does hereby incorporate and adopt by reference,
30 all allegations set forth in all causes of action herein, herein-
31 before and hereinafter complained of, for deprivations of privi-
32 leges and immunities under color of authority and pretense of law.

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III -A

Plaintiff is a citizen of the United States, the UNITED STATES ia a party, and the amount in controversy exceeds, exclusive of interest and costs, Ten Thousand Dollars.

III -B

On August 22, 1975, defendants FPS OFFICERS JAMES CHASTAINE and LUV GREER forcibly took plaintiff from the United States Post Office and forcibly marched plaintiff to his business automobile parked in private parking lot one block away. Plaintiff was menaced by said defendants with deadly weapons, and each of them, for some time at plaintiff's business automobile. Plaintiff not only feared for his continued personal safety, but feared for the personal safety of innocent by-standers as well.

IV

That by reason of said acts plaintiff was placed in great fear for his life and physical well being, and the lives and physical well being of innocent by-standers, defendants then and there having the present ability to continue beating, strangling, handcuffing, falsely arresting, falsely imprisoning, falsely searching and seizing plaintiff again, or carrying out threats to kill plaintiff, acting under color of authority and pretense of law.

V

That by reason of the wrongful and malicious acts of defendants, and each of them, and the pain and wounds and fright caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from Ronald Reagan-2841 page 274.

VI.

WHEREFORE, plaintiff demands judgment against defendants,

1 and each of them, the nature, extent, sum and costs of which
2 shall be proved at trial, and compensatory damages and punitive
3 damages, and for such other relief as deemed just and proper by
4 this Court.

5
6 THIRTY-THIRD CAUSE OF ACTION

7 I

8 Plaintiff does hereby incorporate and adopt by reference,
9 all allegations set forth in JURISDICTION (page 2); Title 28 of
10 the United States Code, Sections 1343, 1346(b); Title 42 of the
11 United States Code, Section 1981 et seq.; and the Fourteenth
12 Amendment to the United States Constitution.

13 II

14 Plaintiff does hereby incorporate and adopt by reference,
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Ronald Reagan-2842

ORIGINAL

1 all allegations set forth herein, hereinafter and hereinbefore com-
2 plained of, for deprivations of privileges and immunities.

3 III

4 Plaintiff is a citizen of the United States and the amount in
5 controversy exceeds ten thousand dollars (\$10,000.), exclusive
6 of interest and costs.

7 IV

8 Plaintiff does not know the true names and capacities of
9 defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
10 therefore sues these defendants by such fictitious names. Plain-
11 tiff will amend this complaint to allege their true names and
12 capacities when ascertained. Plaintiff is informed and believes
13 and thereon alleges that each of the fictitiously named defen-
14 dants is responsible in some manner for the occurrences herein,
15 hereinbefore, and hereinafter alleged, and that Plaintiff's dam-
16 ages as herein alleged were caused and proximately caused by such
17 defendants, acting under color of authority and pretense of law.

18 V

19 In 1972, defendants STATE OF CALIFORNIA, ATTORNEY GENERAL
20 EVELLE J. YOUNGER, security officer, J.C. HARRIS refused to ac-
21 cent plaintiff's filing of charges of criminal acts in California
22 and wrongfully, unlawfully, intentionally, and violently assaulted
23 plaintiff/by threatening plaintiff with "... we know where you
24 are. We can come and get you at the drop of a sombrero...", with
25 such venom and menace in defendants' Harris' voice and words that
26 plaintiff was immediately placed in great fear for his life and
27 physical well being, deprived of privileges and immunities.

Ronald Reagan-2843

28 VI

29 That by reason of the wrongful and malicious acts of defen-
30 dants and of the fright caused plaintiff, plaintiff began immedi-
31 ately to look around thinking state law enforcement officers,
32 agents, employees, or others, were "on the way", and that plain-

ORIGINAL

1 tiff shortly would be unlawfully beaten, maimed, murdered, har-
2 assed, or falsely arrested on the spot by armed officers under
3 the color of authority and law breaking down door, - guns drawn,
4 in malicious, wanton, willful or reckless disregard for plaintiff's
5 rights and the rights of others.

6 VII

7 That in 1972, defendants, and each of them, knowingly and
8 willfully conspired and agreed among themselves to suppress and
9 withhold from law enforcement wrongfully plaintiff BRONSON's new
10 lifesaving firearms and related technologies.

11 VIII

12 That defendants, and each of them, did the acts and things
13 herein alleged pursuant to, and in furtherance of, the conspiracy
14 and agreement above alleged, and hereinafter and hereinbefore
15 complained of.

16 IX

17 By reason of the wrongful, intentional, conspiratorial, and
18 malicious acts of defendants, and each of them, and of the fright
19 thereby caused plaintiff, plaintiff has suffered extreme and
20 severe mental anguish and physical pain and has been injured in
21 mind and body, the nature and extent of which shall be proved at
22 trial, and as incorporated herein under DAMAGES from page 274.

23 X

24 WHEREFORE, plaintiff demands judgment against defendants,
25 and each of them, the nature, extent, sum and costs of which
26 shall be demonstrated at trial; compensatory and punitive damages.

27 THIRTY-FOURTH CAUSE OF ACTION
28 Ronald Reagan-2844

29 I

30 Plaintiff does hereby incorporate and adopt by reference,
31 all allegations set forth in JURISDICTION (page 2); 28 USC 551343,
32 1346(b); 42 USC 51981 et seq.; Amendment XIV to Constitution.

II

1
2 Plaintiff does hereby incorporate and adopt by reference,
3 all allegations set forth herein, hereinafter and hereinbefore com-
4 plained of, for deprivations of privileges and immunities.

III

5
6 Plaintiff is a citizen of the United States whose business
7 address is Post Office Box 588, Sacramento, California, and the
8 amount in controversy exceeds ten thousand dollars (\$10,000.),
9 exclusive of interest and costs.

IV

10
11 Plaintiff does not know the true names and capacities of
12 defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
13 therefore sues these defendants by such fictitious names for
14 damages caused and proximately caused to plaintiff.

V

15
16 On August 17, 1972, Defendants STATE OF CALIFORNIA, STATE
17 ATTORNEY GENERAL EVELLE J. YOUNGER, special agent ANDREW TICKVITZA
18 wrongfully, unlawfully and intentionally/conspired and acted to
19 deliberately intimidate and harass person known by plaintiff at
20 that person's place of employment in malicious, wanton, willful
21 or reckless and conspiratorial disregard for the rights and pri-
22 vacy of plaintiff and others. Under the color of authority, de-
23 fendants' Tickvitza's conduct and words caused immediate fear,
24 apprehension and alarm for that person's safety, the safety of
25 Plaintiff BRONSON, and the safety of others.

Ronald Reagan-2845

VI

26
27 When Plaintiff BRONSON was informed of Defendants' Teckvit-
28 za's wrongful, malicious conduct toward person known to plain-
29 tiff, plaintiff was immediately alarmed and apprehensive for his
30 personal safety and well being, and feared for the safety and
31 well being of others. Plaintiff feared that law enforcement
32 officers, under color of authority and law, were immediately acting
in official capacities, and deprive plaintiff, under color of such

ORIGINAL

police authority, viciously attack plaintiff with deadly weapons,
1 ambush plaintiff, and deprive plaintiff of Constitutional privileges
2 immunities by force, violence, maiming, attempted murder on p'tiff
3 and others. Plaintiff and others remained in constant fear and
4 dread for their safety from that time forward.

5 VII

6 That from 1972 forward, defendants, and each of them, know-
7 ingly and willfully conspired and agreed among themselves to sup-
8 press and wrongfully withhold from law enforcement Plaintiff
9 BRONSON's new lifesaving firearms and related technologies by
10 terror tactics and threats to the lives and personal safety of
11 plaintiff and others.

12 VIII

13 That defendants, and each of them, did the acts and things
14 herein alleged pursuant to, and in furtherance of, the conspiracy
15 and agreement above alleged, and hereinafter and hereinbefore
16 complained of.

17 IX

18 By reason of the wrongful, intentional, conspiratorial, and
19 malicious acts of defendants, and each of them, and of the fright
20 thereby caused plaintiff, plaintiff has suffered extreme and
21 severe mental anguish and physical pain and has been injured in
22 mind and body, the nature and extent of which shall be proved at
23 trial, and as incorporated herein under DAMAGES from page 274.

24 Ronald Reagan-2846

25 X

26 WHEREFORE, plaintiff demands judgment against defendants,
27 and each of them, the nature, extent, sum and costs of which
28 shall be demonstrated at trial.

29 THIRTY-FIFTH CAUSE OF ACTION

30 I

31 plaintiff does hereby incorporate and adopt by reference,
32 all allegations set forth in JURISDICTION (page 2); 28 USC §§1343,

ORIGINAL

1 1346(b); 42 USC §1981 et seq.; Constitutional Amendment XIV.

2 II

3 Plaintiff does hereby incorporate and adopt by reference,
4 all allegations set forth herein, hereinafter and hereinbefore com-
5 plained of, for deprivations of privileges and immunities.

6 III

7 Plaintiff is a citizen of the United States, and the amount
8 in controversy exceeds ten thousand dollars.

9 IV

10 Plaintiff does not know the true names and capacities of de-
11 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
12 therefore sues these defendants by such fictitious names. Plain-
13 tiff will amend this complaint to allege their true names and
14 capacities when ascertained. Plaintiff is informed and believes
15 and thereon alleges that each of the fictitiously named defen-
16 dants is responsible in some manner for the occurrences herein,
17 hereinbefore, and hereinafter alleged, and that Plaintiff's dam-
18 ages as herein alleged were caused and proximately caused by
19 such defendants.

20 V

21 Frequently in 1973, on April ~~15~~ 25, 1974, May 3, 1974, May 14,
22 1974, November 5, 1976, June 4, 1977, and February 25, 1978, de-
23 fendants JOHN DOES ONE THROUGH ONE HUNDRED have acted with mali-
24 cious, wanton, willful or reckless disregard for plaintiff's
25 rights and safety, and the rights and safety of others, and with-
26 out cause or provocation sabotaged plaintiff's business equipment to the severe extent
27 that plaintiff and others would be permanently maimed or killed
28 in attempting to regularly use the sabotaged equipment.

Ronald Reagan-2847

29 VI

30 That by reason of the wrongful and malicious acts of defen-
31 dants and of the immediate and continuing alarm, fear, apprehen-
32 sion for plaintiff's personal safety and well being, and for the

ORIGINAL

was deprived privileges and immunities guaranteed to plaintiff in
1 .I, IV, V, VI, VII and XIV Amendments. Plaintiff feared that at any
2 time defendants, and each of them, some members of the law en-
3 forcement community with duty to protect plaintiff and others, -
4 not harm them, would unlawfully murder, permanently maim or de-
5 stroy plaintiff and others, and business equipment regularly used.

6 VII

7 That in 1972 forward, defendants, and each of them, know-
8 ingly and willfully conspired and agreed among themselves to sup-
9 press and withhold from law enforcement, wrongfully, plaintiff
10 BRONSON's new lifesaving firearms and related technologies by
11 terror tactics and threats to the lives and personal safety of
12 plaintiff and others.

13 VIII

14 That defendants, and each of them, did the acts and things
15 herein alleged pursuant to, and in furtherance of, the conspiracy
16 and agreement above alleged, and hereinafter and hereinbefore
17 complained of.

18 IX

19 By reason of the wrongful, intentional, and malicious acts
20 of defendants, and each of them, and the fright thereby caused
21 plaintiff and others, plaintiff has suffered extreme and severe
22 mental anguish and physical pain, and has been injured in mind
23 and body and earning capacity, the nature and extent of which
24 shall be proved at trial, and as incorporated herein under DAM-
25 AGES from page 274.

26 X

27 WHEREFORE, plaintiff demands judgment against defendants,
28 and each of them, the nature, extent, sum and costs of which
29 shall be demonstrated at trial, and compensatory and punitive
30 damages, and for such other relief as deemed just and proper by
31 this Court.

Ronald Reagan-2848

THIRTY-SIXTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC §§1343, 1346(b); 42 USC §1981 et seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth herein, hereinbefore, and hereinafter complained of, for loss of privileges and immunities under color of law.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

On or about August 26, 1973, defendants AMERICAN TELEPHONE AND TELEGRAPH, PACIFIC TELEPHONE AND TELEGRAPH, agents and employees wrongfully, unlawfully, intentionally, and violently assaulted plaintiff by threatening plaintiff/with "... punch you in the nose...", and refused to permit plaintiff to file criminal charges of illegal wiretapping, eavesdropping, impersonation of an FBI agent on an illegally and intentionally interfered with and disrupted business telephone line, etc., hereinbefore and hereinafter complained of. Under color of authority of a public utility charging for the services rendered to plaintiff and others, defendants' employee and agent acted to throw plaintiff bodily from the business premises of the public utility, and by their acts, voice and words made plaintiff immediately in great fear for his life and physical well being, causing plaintiff to leave the busi-

ORIGINAL

1 ness premises without compleating plaintiff's lawful business.

2 VI

3 Plaintiff BRONSON was immediately alarmed, fearful, and ap-
4 prehensive for his personal safety and well being, and for the
5 safety and well being of others. Plaintiff feared that defen-
6 dants, and each of them, were shortly to beat, maim or murder
7 plaintiff, and as defendants, and each of them, intended, plain-
8 tiff's well founded criminal charges of illegal wiretapping and
9 other illegal electronic invasion of plaintiff's business equip-
10 ment, were ignored and continued to present time by said defen-
11 dants, and each of them; defendants, and each of them refuse to
12 investigate, remove and otherwise take corrective action.

13 VII

14 That in 1972 forward, defendants, and each of them, know-
15 ingly and willfully organized and caused to be organized conspir-
16 acy and agreement among themselves, and each of them, to suppress
17 and wrongfully withhold from law enforcement plaintiff BRONSON's
18 new lifesaving firearms and related technologies by illegal acts
19 and conspiracies to illegally wiretap plaintiff's business tele-
20 phone without cause.

21 VIII

22 That defendants, and each of them, did the acts and things
23 herein alleged pursuant to, and in furtherance of, the conspiracy
24 and agreement above alleged, and hereinafter and hereinbefore
25 complained of.

26 IX

27 By reason of the wrongful, intentional, and malicious acts
28 of defendants, and each of them, and the fright thereby caused
29 plaintiff and others, plaintiff has suffered extreme and severe
30 mental anguish and physical pain, and has been injured in mind
31 and body and earning capacity, the nature and extent of which
32 shall be proved at trial, and as incorporated herein under DAMAGES,

Ronald Reagan-2850

ORIGINAL

1 the nature and extent of which shall be proved at trial.

2 X

3 WHEREFORE, plaintiff demands judgment against defendants,
4 and each of them, the nature, extent, sum and costs of which
5 shall be proved at trial, and for compensatory and punitive
6 damages, and for such other relief as is deemed just and proper
7 by this Court.

8 THIRTY-SEVENTH CAUSE OF ACTION

9 I

10 Plaintiff does hereby incorporate and adopt by reference,
11 all allegations set forth in JURISDICTION (page 2); Title 28, USC
12 §§1343, 1346(b); 42 USC §1981 et seq.; the Fourteenth Amendment to
13 the Constitution;

14 II

15 Plaintiff does hereby incorporate and adopt by reference,
16 all allegations set forth in all causes of action hereinbefore
17 and hereinafter complained of, for loss of rights under color of
18 authority, particularly as protected by the Fourth Amendment to
19 the Constitution of the United States.

20 III

21 Plaintiff is a citizen of the United States, the UNITED
22 STATES is a party, and the amount in controversy exceed, exclu-
23 sive of interests and costs, Ten Thousand Dollars.

24 IV

25 Plaintiff does not know the true names and capacities of
26 defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
27 therefore sues these defendants, and each of them, by such ficti-
28 tious names for damages caused and proximately caused to plain-
29 tiff.

30 Ronald Reagan-2851
v

31 Defendants are:

32 1. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTOR CLARENCE

ORIGINAL

M. KELLEY.

2. Def. AMERICAN TELEPHONE AND TELEGRAPH COMPANY (AT&T),
headquarters 195 Broadway, New York, New York 10007.

3. Def. PACIFIC TELEPHONE AND TELEGRAPH COMPANY DIVISION OF
AT&T, Northern California Headquarters, 140 New Montgomery Street,
San Francisco, California 94105; Sacramento Area Headquarters,
1407 "J" Street, Sacramento, California.

4. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J.
YOUNGER, GOVERNOR EDMUND G. BROWN, Jr., GOVERNOR RONALD REAGAN,
State Capitol, Sacramento, California.

VI

On the following example dates, 1973: 2/9,13; 3/12-15; 7/13;
8/30,31; 9/4,24; 11/20; 1974: 1/10,16; 2/7,28; 5/8,14; 11/8,14;
12/6,7; 1975: 1/15; 2/4,5,8,9,11; 4/21,22; 7/8; 9/9; 1976: 1/19,
defendants agents and employees illegally electronically caused
or forced plaintiff's business telephone to "ring" (strange sound)
or "malfunction", especially during off non-business hours. With-
out Court order, search warrant, without cause or provocation,
under color of authority and pretense of law, defendants, and each
of them, maintained and maintain to present illegal surveillance
of plaintiff's business telephone in malicious, wanton, willful,
intentional, wrongful, conspiratorial disregard for the rights of
plaintiff and others each and every time, depriving to plaintiff
privileges and immunities guaranteed by Amendments I, IV, V, VI, VII,
and XIV of the Consitution of the United States.

VII

That each and every time defendant(s) did these acts and
things herein complained of, defendant(s) invaded plaintiff's
right of privacy and right to uninterrupted, nonmonitored business
telephone use for lawful purposes.

Ronald Reagan-2852

VIII

The above-mentioned wrongful, conspiratorial, malicious, war-
rantless, and willful acts constituted an invasion of plaintiff's

ORIGINAL

1 right of privacy in that plaintiff in no way consented to or author -
2 ized the warrantless search and illegal wiretap and electronic
3 invasion of plaintiff's business telephone, nor did plaintiff
4 submit voluntarily to these wrongful invasions by wiretapping il-
5 legally of plaintiff's business telephone.

6 IX

7 The above-mentioned acts and conduct of the defendants, and
8 each of them, claimed by them to be under federal and/or state
9 and/or regulated public utility authority, constituted an abuse
10 of their federal and/or state and/or regulated public utility
11 authority and was not within their scope of employment as federal
12 and/or state and/or regulated public utility agents, employees or
13 servants, in that their acts and conduct were not based on the
14 exercise or performance of discretionary function or duty assumed
15 by them as agents or employees or servants of the federal govern-
16 ment's FEDERAL BUREAU OF INVESTIGATION and/or state government's
17 ATTORNEY GENERAL'S OFFICE and/or regulated public utility and
18 were not acts and conduct done pursuant to the regulations of the
19 UNITED STATES ATTORNEY GENERAL/FEDERAL BUREAU OF INVESTIGATION
20 and/or STATE ATTORNEY GENERAL'S OFFICE and/or regulated public
21 TELEPHONE utility and were acts performed within the scope of de-
22 fendant(s) employment but without exercising due care while acting
23 within the scope of their employment, and defendants, and each of
24 them, acted in fraud, corruption or malice.

25 X

26 As a result of the above-mentioned conduct of the defendants,
27 and each of them, plaintiff was deprived of rights, privileges,
28 and immunities secured to him by the Constitution and Laws of the
29 United States in that such conduct constituted an arbitrary in-
30 trusion by defendant(s) upon the security of plaintiff's privacy
31 and body, thereby depriving plaintiff of life, liberty, and prop-
32 erty without due process of law and plaintiff is entitled to re-

ORIGINAL

1 lief under Title 42 of the United States Code under Section 1983.

2 XI

3 That by reason of the injuries inflicted by defendants, and
4 each of them, plaintiff was frightened and has suffered bodily
5 pain and discomfort, and has suffered great pain of mind and
6 mental anguish and emotional distress.

7 XII

8 That from 1972 to present time, defendants, and each of them,
9 knowingly and willfully organized and caused to be organized
10 conspiracy and agreement among themselves, and each of them, and
11 with others, to suppress and wrongfully withhold from law enforce-
12 ment plaintiff's new lifesaving firearms and related technologies
13 by illegal acts

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Ronald Reagan-2854

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1 and conspiracies to illegally wiretap plaintiff's business tele-
2 phone without cause or provocation under color of authority.

3 X

4 That defendants, and each of them, did the acts and things
5 herein alleged pursuant to, and in furtherance of, the conspiracy
6 and agreement above alleged, and hereinafter and hereinbefore
7 complained of.

8 XI

9 By reason of the wrongful, intentional, and malicious acts
10 of defendants, and each of them, and the fright thereby caused
11 plaintiff and others, plaintiff has suffered extreme and severe
12 mental anguish and physical pain, and has been injured in mind
13 and body and earning capacity, the nature and extent of which
14 shall be proved at trial, and as incorporated herein under DAM-
15 AGES from page 274.

16 XII

17 WHEREFORE, plaintiff demands judgment against defendants,
18 and each of them, compensatory and punitive damages, sum and costs
19 to be proved at trial, and other just and proper relief.

20 THIRTY-EIGHTH CAUSE OF ACTION

21 I

22 Plaintiff does hereby incorporate and adopt by reference,
23 all allegations set forth in Paragraph I-VI, JURISDICTION, Title
24 28 U.S.C./§1343, §1346(b); 42 USC §1981 et seq; Amendment XIV.

25 II

26 Plaintiff does hereby incorporate and adopt by reference,
27 all allegations set forth in all causes of action hereinbefore and
28 hereinafter complained of, loss of rights under color of authority.

Ronald Reagan-2855

29 III

30 Plaintiff is a citizen of the United States, and the amount
31 in controversy exceeds ten thousand dollars; deprivations to Due
32 Process and Equal Protection Clauses of Amendment XIV, Constitution.

ORIGINAL

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

From 1972 to present time, defendants CITY OF SACRAMENTO, SACRAMENTO POLICE DEPARTMENT, POLICE CHIEF WILLIAM J. KINNEY, agents and employees, without cause or provocation, wrongfully, unlawfully, intentionally, and maliciously assaulted plaintiff with deadly weapons (guns and cars), and did other wrongful acts. Defendants' uniformed officers repeatedly drove CITY OF SACRAMENTO motor vehicles and harassed, followed, stalked, tracked, attempted to ram plaintiff's business automobile, and otherwise abuse plaintiff, as plaintiff conducted plaintiff's lawful business. Further, defendants, and each of them, did, under color of authority and pretense of law:

(1) Track plaintiff through the streets of Sacramento by CITY OF SACRAMENTO decaled vehicles and uniformed officers of the SACRAMENTO POLICE DEPARTMENT throughout the summer of 1973, and especially January 23, 1974 and May 8, 1974; followed plaintiff for blocks at a time in 1975 and 1976, especially May 5, 1975, February 10, 1976, and April 25, 1976.

(2) Come close enough to plaintiff during the summer of 1974 and on July 23, 1975 for plaintiff to identify "BADGE NO. 295" of the CITY OF SACRAMENTO POLICE DEPARTMENT.

(3) Come close enough to plaintiff for plaintiff to identify by "BADGE NO. 341, OFFICER GORSKI OF THE SACRAMENTO POLICE DEPARTMENT on October 3, 1974 and May 14, 1975.

(4) That on October 3, 1974, defendants' OFFICER GORSKI tracked and menaced plaintiff all over McKinley Park, Sacramento.

(5) That the attempted ramming of plaintiff's legally parked business vehicle occurred on or about February 10, 1976.

All conspiracies and acts herein complained of deprived plaintiff

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of lawful, unharassed use of CITY OF SACRAMENTO streets.

VI

That from 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally acting and conspiring to assault plaintiff with deadly weapons repeatedly.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement above alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

VII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

VIII

WHEREFORE, plaintiff demands judgment against defendants, and each of them, compensatory and punitive damages, sum and costs to be proved at trial, and other just and proper relief from Court.

THIRTY-NINTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraphs I-VI, JURISDICTION, Title §1343, 28 U.S.C./§1346(b); 42 USC §1981 et seq., Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference,

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1 all allegations set forth herein, hereinafter and hereinbefore com-
2 plained of, for deprivations of privileges and immunities.

3 III

4 Plaintiff is a citizen of the United States, and the amount
5 in controversy exceeds ten thousand dollars.

6 IV

7 Plaintiff does not know the true names and capacities of de-
8 fendants used herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
9 therefore sues these defendants, and each of them, by such ficti-
10 tious names for damages caused and proximately caused to plaintiff.

11 V

12 On or about January 23, 1974, defendants STATE OF CALIFORNIA,
13 STATE CONTROLLER HOUSTON I. FLOURNOY caused defendants STATE OF
14 CALIFORNIA, STATE POLICE, and others, to wrongfully, unlawfully,
15 intentionally, and violently assault plaintiff with deadly weap-
16 ons on private business property/ without cause or provocation. Defendants, and each of them,
17 sent state agents and employees in two (2) cars to willfully, un-
18 lawfully and violently use force on plaintiff, or other malicious,
19 wanton, willful or reckless disregard for plaintiff's rights. DE-
20 fendants' agents and employees trespassed on business property
21 and prevented plaintiff from leaving building. Defendants' agents
22 and employees sat in the cars for some time, assaulting plaintiff,
23 humiliating, outraging and embarrassing plaintiff, and prevented
24 plaintiff from conducting his lawful business activities.

25 VI

26 That in 1972 forward, defendants, and each of them, knowingly
27 and willfully organized and caused to be organized conspiracy and
28 agreement among themselves, and each of them, and with others, to
29 suppress and wrongfully withhold from law enforcement plaintiff's
30 new lifesaving firearms and related technologies by illegally
31 assaulting plaintiff, and deprived plaintiff of privileges and im-
32 munities guaranteed by the Constitution under color of authority and
law.

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VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff and others, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be demonstrated at trial, compensatory and punitive damages.

FORTIETH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC §§1343, 1346(b); 42 USC §1981 et seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth herein, hereinafter, hereinbefore complained of, for loss of privileges and immunities under color of law.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceed ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and

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1 therefore sues these defendants, and each of them, by such facti-
2 tious names for damages caused and proximately caused to plaintiff.

3
4 V

5 On or about January 23, 1976, defendants STATE OF CALIFORNIA,
6 CALIFORNIA HIGHWAY PATROL, agents and employees, acting under
7 without cause or provocation,
8 color of authority and pretense of law/ operated a pursuit plane
9 wrongfully, unlawfully, intentionally, maliciously, and violently
10 in assault on plaintiff while taking his usual therapeutic morn-
11 ing walk at Miller Park, a walk known to law enforcement agents
12 and employees. Defendants made roaring, wide-throttle swoop too
13 law over plaintiff, circling plaintiff in a roaring low "U" turn.
14 Said defendants, and each of them, acted in malice, wanton, wil-
15 ful or reckless disregard for plaintiff's rights, and almost
16 burst plaintiff's eardrums, caused violent, blinding headache,
17 and rendered plaintiff unable to drive for several hours.

18 VI

19 That in 1972 forward, defendants, and each of them, knowing-
20 ly and willfully organized and caused to be organized conspiracy
21 and agreement among themselves, and each of them, and with others,
22 to suppress and wrongfully withhold from law enforcement plain-
23 tiff's new lifesaving firearms and related technologies by ille-
24 gally assaulting and battering plaintiff.

25 VII

26 That defendants, and each of them, did the acts and things
27 herein alleged pursuant to, and in furtherance of, the conspiracy
28 and agreement herein alleged, and hereinafter and hereinbefore
29 complained of, acting under color of authority and pretense of
30 law.

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31 VIII

32 By reason of the wrongful, intentional, and malicious acts
of defendants, and each of them, and the/fright thereby caused
plaintiff, plaintiff has suffered extreme and severe mental an-

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1 guish and physical pain, and has been injured in mind and body
2 and earning capacity, the nature and extent of which shall be
3 proved at trial, and as incorporated herein under DAMAGES from
4 page 274.

5 IX

6 WHEREFORE, plaintiff demands judgment against defendants,
7 and each of them, compensatory and punitive damages, sum and costs
8 to be proved at trial, and such other relief deemed just and proper.

9 FORTY-FIRST CAUSE OF ACTION

10 I

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action filed herein.

13 II

14 Plaintiff does hereby incorporate and adopt by reference,
15 all allegations set forth in JURISDICTION (page 2); Title 28 USC
16 §1343,
16 ✓ §1346(b); 42 USC §1981 et seq; Equal Protection Clause XIV Amend.

17 III

18 Plaintiff is a citizen of the United States, and the amount
19 in controversy exceeds ten thousand dollars.

20 IV

21 Plaintiff does not know the true names and capacities of de-
22 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
23 therefore sues these defendants, and each of them, by such ficti-
24 tious names for damages caused and proximately caused to plaintiff.

25 V

26 On or about February 3, 1976, defendants STATE OF CALIFORNIA,
27 CALIFORNIA HIGHWAY PATROL, and others, without cause or provocation
28 for reporting on or about January 23, 1976, to defendant CALIFORNIA
29 STATE HIGHWAY PATROL OFFICIALS, and others, that defendants ille-
30 gally, unlawfully, and negligently flew defendant's pursuit plane
31 in diving, circling assault of plaintiff on January 23, 1976.
32 Defendants, under color of authority and pretense of law, tracked,
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1 "dogged", and harassed plaintiff on the streets of Sacramento
2 while plaintiff was attempting to conduct his lawful business.

3 VI

4 That from 1972 forward, defendants, and each of them, know-
5 ingly and willfully organized and caused to be organized conspir-
6 acy and agreement among themselves, and each of them, and with
7 others, to suppress and wrongfully withhold from law enforcement
8 plaintiff's new lifesaving firearms and related technologies by
9 illegally assaulting plaintiff.

10 VII

11 That defendants, and each of them, did the acts and things
12 herein alleged pursuant to, and in furtherance of, the conspiracy
13 and agreement herein alleged, and hereinafter and hereinbefore
14 complained of, acting under color of authority and pretense of
15 law, and deprived plaintiff of privileges and immunities from harm.

16 VIII

17 By reason of the wrongful, intentional, and malicious acts
18 of defendants, and each of them, and the fright thereby caused
19 plaintiff, plaintiff has suffered extreme and severe mental an-
20 guish and physical pain, and has been injured in mind and body
21 and earning capacity, the nature and extent of which shall be
22 proved at trial, and as incorporated herein under DAMAGES from
23 page 274.

24 IX

25 WHEREFORE, plaintiff demands judgment against defendants,
26 and each of them, compensatory and punitive damages, which shall
27 be proved at trial, and other relief deemed just and proper by Court.

28 FORTY-SECOND CAUSE OF ACTION

29 I

30 Plaintiff does hereby incorporate and adopt by reference,
31 all allegations set forth in Paragraphs I-VI, JURISDICTION, Title
32 28 U.S.C./§1343, 42 USC §1961 et seq; Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action complained of herein, hereinafter, hereinbefore, for damages under color of law.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

On or about February 3, 1974, defendants STATE OF CALIFORNIA and CHIEF GUY R. OATES, CALIFORNIA STATE POLICE, assaulted, falsely arrented, and falsely without cause or provocation imprisoned plaintiff/ in the California State Capitol, and refused to permit plaintiff to leave the offices of defendant STATE POLICE WHEN PLAINTIFF DEMANDED TO DO SO. Said defendants, and each of them, stopped plaintiff from exercising his right to freedom of speech, due process of law, and right to conduct plaintiff's lawful business in a lawful manner, and the right to pursue plaintiff's lawful activities in a lawful manner without intimidation and interference and malicious disregard for plaintiff's rights under the color of authority and pretense of law.

VI

That from 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting, falsely imprisoning and falsely arresting plaintiff, depriving plaintiff of Constitutional privileges and immunities.

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, acting under color of authority and pretense of law.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and the fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be demonstrated at trial. compensatory and punitive damages.

FORTY-THIRD CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC §§ 1343, 1346(b); 42 USC §1981 et seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter, hereinbefore complained of, for damages under color of law.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of de-
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1 defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
2 therefore sues these defendants, and each of them, by such ficti-
3 tious names for damages caused and proximately caused to plaintiff.

4 V

5 On or about September 29, 1972, defendants STATE OF CALI-
6 FORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER, and others, agents
7 and employees, under color of authority and pretense of law,
8 harassed, abused, intimidated, embarrassed, humiliated, restrained,
9 and otherwise obstructed and interfered with plaintiff in the
10 U.S. Post Office, 8th and I Streets, Sacramento/ One agent or
11 employee of defendants identified himself as a "Mr. Baier". De-
12 fendants agents and employees were not only accosting plaintiff
13 for defendant CALIFORNIA STATE ATTORNEY GENERAL YOUNGER, but
14 also for defendant FEDERAL BUREAU OF INVESTIGATION and the NIXON
15 ADMINISTRATION.

16 VI

17 Plaintiff was obstructed from leaving the post office as he
18 wished by said two (2) agents and employees of defendants acting
19 under color of authority and pretense of law. Plaintiff was fear-
20 ful and apprehensive about being attacked and "jumped" by two (2)
21 armed men. Plaintiff demanded that said defendants, their agents
22 and employees, and each of them, submit all questions to plaintiff
23 in writing and addressed to plaintiff's attorney. Said defendants
24 refused and forcibly conducted and continued their assault,
25 obstruction, harassment, intimidation, humiliation, and embarrass-
26 ment of plaintiff in an open public place crowded with innocent
27 people seeking postal service.

28 VII

29 That from 1972 forward, defendants, and each of them, and
30 with others, knowingly and willfully organized and caused to be
31 organized conspiracy and agreement among themselves, to suppress
32 and wrongfully withhold from law enforcement plaintiff's new

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lifesaving law enforcement technologies by illegally assaulting
1 and obstructing plaintiff, and depriving plaintiff of privileges
2 and immunities guaranteed to plaintiff by I, IV, VI, VII, XIV Amendmts.

3 VIII

4 That defendants, and each of them, did the acts and things
5 herein alleged pursuant to, and in furtherance of, the conspiracy
6 and agreement herein alleged, and hereinafter and hereinbefore
7 complained of, acting under color of authority and pretense of
8 law.

9 IX

10 By reason of the wrongful, intentional, and malicious acts
11 of defendants, and each of them, and the fright thereby caused
12 plaintiff, plaintiff has suffered extreme and severe mental an-
13 guish and physical pain, and has been injured in mind and body
14 and earning capacity, the nature and extent of which shall be
15 proved at trial, and as incorporated herein under DAMAGES from
16 page 274.

17 X

18 WHEREFORE, plaintiff demands judgment against defendants,
19 and each of them, compensatory and punitive damages, to be proved
20 at trial, and such other relief as deemed just and proper by Court.

21 FORTY-FOURTH CAUSE OF ACTION

22 I

23 Plaintiff does hereby incorporate and adopt by reference,
24 all allegations set forth in JURISDICTION (page 2);; Title 28 USC
25 §1343,
26 §1346(b); 42 USC §1981 et seq.; Constitution Amendment XIV.

26 II

27 Plaintiff does hereby incorporate and adopt by reference,
28 all allegations set forth in all causes of action herein com-
29 plained of, loss of privileges/immunities under color of law.

30 III

31 Plaintiff is a citizen of the United States, and the amount
32 in controversy exceeds ten thousand dollars.

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IV

1
2 Plaintiff does not know the true names and capacities of de-
3 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
4 therefore sues these defendants, and each of them, by such ficti-
5 tious names for damages caused and proximately caused to plaintiff.

V

6
7 On or about September 21 and 27, 1973, defendants STATE OF
8 CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF GUY OATES, and others,
9 without cause or provocation,
10 caused STATE POLICE agents and employees to stalk, track and "dog"
11 plaintiff, on foot and in car, away from State property. Under
12 color of authority and pretense of law, said defendants prevented
13 plaintiff from freely exercising plaintiff's rights of due process
14 of law, lawful pursuit of business activities, free from fear or
15 intimidation or worrying as to just when defendants' uniformed
16 and gun-carrying officers would assault and injure plaintiff
severely in his body or mind.

VI

17
18 That from 1972 forward, defendants, and each of them, and
19 with others, knowingly and willfully organized and caused to be
20 organized conspiracy and agreement among themselves, to suppress
21 and wrongfully withhold from law enforcement plaintiff's new
22 lifesaving firearms and related technologies by illegally assault-
23 ing plaintiff.

VII

24
25 That defendants, and each of them, did the acts and things
26 herein alleged pursuant to, and in furtherance of, the conspiracy
27 and agreement herein alleged, and hereinafter and hereinbefore
28 complained of, acting under color of authority and pretense of
29 law.

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VIII

30
31 By reason of the wrongful, intentional, and malicious acts
32 of defendants, and each of them, and the fright thereby caused

ORIGINAL

1 plaintiff, plaintiff has suffered extreme and severe mental an-
2 guish and physical pain, and has been injured in mind and body
3 and earning capacity, the nature and extent of which shall be
4 proved at trial, and as incorporated herein under DAMAGES from
5 page 274.

6 IX

7 WHEREFORE, plaintiff demands judgment against defendants,
8 and each of them, the nature, extent, sum and costs of which
9 shall be demonstrated at trial, compensatory and punitive damages.

10 FORTY-FIFTH CAUSE OF ACTION

11 I

12 Plaintiff does hereby incorporate and adopt by reference,
13 all allegations set forth in JURISDICTION (page 2); 28 USC §§1343,
14 1346(b); 42 USC §1981 et seq.; Constitutional Amendment XIV.

15 II

16 Plaintiff does hereby incorporate and adopt by reference,
17 all allegations set forth in all causes of action herein, herein-
18 before, hereinafter complained of for damages under color of law.

19 III

20 Plaintiff is a citizen of the United States, and the amount
21 in controversy exceeds ten thousand dollars.

22 IV

23 Plaintiff does not know the true names and capacities of de-
24 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
25 therefore sues these defendants, and each of the, by such ficti-
26 tious names for damages caused and proximately caused to plaintiff.

27 Ronald Reagan-2868

28 V

29 On or about September 30, 1972, defendant FEDERAL BUREAU OF
30 INVESTIGATION, agents and employees, under color of authority and
31 pretense of law, wrongfully, unlawfully, intentionally, and vio-
32 lently assaulted plaintiff with deadly weapons on private business

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1 property. Defendants, and each of them, sent FBI agents and em-
2 ployees to willfully, unlawfully and violently use force on plain-
3 tiff, or other malicious, wanton, willful or reckless disregard
4 for plaintiff's rights. Defendants' agents and employees tres-
5 passed on business property and prevented plaintiff from leaving
6 building. Defendants' agents and employees sat in the car for
7 some time, assaulting plaintiff, humiliating, outraging and em-
8 barrassing plaintiff, and prevented plaintiff from conducting his
9 lawful business activities in loss of privileges and immunities.

10 VI

11 That in 1972 forward, defendants, and each of them, know-
12 ingly and willfully organized and caused to be organized conspir-
13 acy and agreement among themselves, and each of them, and with
14 others, to suppress and wrongfully withhold from law enforcement
15 plaintiff's new lifesaving firearms and related technologies by
16 illegally assaulting plaintiff.

17 VII

18 That defendants, and each of them, did the acts and things
19 herein alleged pursuant to, and in furtherance of, the conspiracy
20 and agreement herein alleged, and hereinafter and hereinbefore
21 complained of, acting under color of authority and pretense of
22 law.

23 VIII

24 By reason of the wrongful, intentional, and malicious acts
25 of defendants, and each of them, and the fright thereby caused
26 plaintiff and others, plaintiff has suffered extreme and severe
27 mental anguish and physical pain, and has been injured in mind
28 and body and earning capacity, the nature and extent of which
29 shall be proved at trial, and as incorporated herein under
30 DAMAGES from page 274. Ronald Reagan-2869

31 IX

32 WHEREFORE, plaintiff demands judgment against defendants,
and each of them, the nature, extent, sum and costs of which

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shall be proved at trial, and compensatory and punitive damages,
and such other relief deemed just and proper by this Court.

FORTY-SIXTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference,
all allegations set forth in JURISDICTION (page 2); 28 USC §§1343,
1346(b); 42 USC §1981 et seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference,
all allegations set forth in all causes of action herein, hereinbe-
fore, hereinafter complained of, for damages under color of law.

III

Plaintiff is a citizen of the United States, and the amount
in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of de-
fendants sued herein as HOHN DOES ONE THROUGH ONE HUNDRED, and
therefore sues these defendants, and each of them, by such ficti-
tious names for damages caused and proximately caused to plaintiff.

V

On or about October 4, 1972, defendant FEDERAL BUREAU OF
INVESTIGATION agents and employees, including one "TOMMY RAY",
under color of authority and pretense of law, harassed, abused,
intimidated, embarrassed, humiliated, restrained, and otherwise
obstructed and interfered with plaintiff in the U.S. Post Office,
8th and I Streets, Sacramento.

VI

Plaintiff was obstructed from leaving the Post Office as he
wished by said tow (2) agents and employees of defendants FBI,
L. PATRICK GRAY DIRECTOR, acting under color of authority and
pretense of law. Plaintiff was fearful and apprehensive about
being attacked and "jumped" by two (2) armed men. Plaintiff de-
manded that said defendants, their agents and employees, and

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1 each of them, submit all questions to plaintiff in writing and
2 addressed to plaintiff's attorney. Said defendants refused and
3 forcibly conducted and continued their assault, obstruction, har-
4 assment, intimidation, humiliation, and embarrassment of plaintiff
5 in an open public place crowded with innocent people seeking
6 postal service.

7 VII

8 When plaintiff managed to get out of the Post Office, de-
9 fendant's FBI agent "TOMMY RAY" stalked and "dogged" plaintiff
10 down the street to City Hall, up the stairs and into the City Hall
11 building. FBI agent "RAY" refused to/leave plaintiff alone and
not follow plaintiff and

12 VIII

13 That from 1972 forward, defendants, and each of them, and
14 with others, knowingly and willfully organized and caused to be
15 organized conspiracy and agreement among themselves, to suppress
16 and wrongfully withhold from law enforcement plaintiff's new life-
17 saving firearms and related technologies by illegally assaulting
18 and obstructing plaintiff, under color and pretense of authority.

19 IX

20 That defendants, and each of them, did the acts and things
21 herein alleged pursuant to, and in furtherance of, the conspiracy
22 and agreement herein alleged, and hereinafter and hereinbefore
23 complained of, acting under color of authority and pretense of
24 law, interfering with plaintiff's Constitutional privileges and im-
25 munities.

26 X

27 By reason of the wrongful, intentional, and malicious acts
28 of defendants, and each of them, and the fright thereby caused
29 plaintiff, plaintiff has suffered extreme and severe mental an-
30 guish and physical pain, and has been injured in mind and body
31 and earning capacity, the nature and extent of which shall be
32 proved at trial, and as incorporated herein under DAMAGES from
page 274.

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XI

WHEREFORE, plaintiff demands judgement against defendants, and each of them, compensatory and punitive damages, to be proved at trial, and such other relief deemed just and proper by the Court.

FORTY-SEVENTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 USC §1343, §1346(b); 42 USC §1981 se seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of for loss of privileges and immunities under color of authority.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars; U.S. a party.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

On or about October 4, 1972, defendants FBI, JOHN REED AGENT IN CHARGE, L. PATRICK GRAY DIRECTOR, agents and employees, under without cause or provocation, color of authority and pretense of law, retaliated against plaintiff for plaintiff's insistence that the FBI immediately stop harassment and abuse of Plaintiff BRONSON. FBI AGENT IN CHARGE JOHN REED and other agents and employees forcibly, violently, loudly, wrongfully, unlawfully, maliciously and wantonly, yelling, "surrounded" the building in which plaintiff was conducting business with drawn handguns, rifles and walkie talkies. Defendants threatened violent force against plaintiff and trespassed on busi-

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1 ness property and prevented plaintiff from leaving building. De-
2 fendants' agents and employees sat in cars and milled around the
3 building for some time, assaulting plaintiff, humiliating, out-
4 raging and embarrassing plaintiff, and prevented plaintiff from
5 conducting his lawful business activities.

6 VI

7 That in 1972 forward, defendants, and each of them, knowingly
8 and willfully organized and caused to be organized conspiracy and
9 agreement among themselves, and each of them, and with others, to
10 suppress and wrongfully withhold from law enforcement plaintiff's
11 new lifesaving firearms and related technologies by illegally
12 assaulting plaintiff.

13 VII

14 That defendants, and each of them, did the acts and things
15 herein alleged pursuant to, and in furtherance of, the conspiracy
16 and agreement herein alleged, and hereinafter and hereinbefore
17 complained of, acting under color of authority and pretense of
18 law, and invaded plaintiff's guaranteed privileges and immunities.

19 VIII

20 By reason of the wrongful, intentional, and malicious acts
21 of defendants, and each of them, and the fright thereby caused
22 plaintiff, plaintiff has suffered extreme and severe mental an-
23 guish and physical pain, and has been injured in mind and body
24 and earning capacity, the nature and extent of which shall be
25 proved at trial, and as incorporated herein under DAMAGES from
26 page 274.

27 IX

28 WHEREFORE, plaintiff demands judgment against defendants,
29 and each of them, the nature, extent, sum and costs of which
30 shall be proved at trial.

31 / Ronald Reagan-2873
32 /

FORTY-EIGHTH CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); 28 USC §§1343, 1346(b); 42 USC §1981 et seq.; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinbefore, hereinafter complained, of for damages under color of law.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

On August 27, 1976, defendant SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD), employee JACK DEBOISE, was sent to restore earlier unlawfully and illegally discontinued service to business property, said service having been illegally discontinued in retaliation against plaintiff for plaintiff's having filed this lawsuit before this Court. When plaintiff demanded why the service had been wrongfully discontinued when there was no outstanding charge owed to defendant SMUD, defendant SMUD's agent and employee, without cause or provocation, threatened plaintiff and started swinging his fist at plaintiff. When defendant's employee was a witness, defendant's employee dropped his fist, stopped his swing at plaintiff, turned on the illegally disconnected service, and left.

VI

That defendants, and each of them, knowingly and willfully

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1 organized and caused to be organized conspiracy and agreement among
2 themselves, and each of them, and with others, to suppress and
3 wrongfully withhold from law enforcement plaintiff's new life-
4 saving firearms and related technologies by illegally assaulting
5 plaintiff, and depriving him of guaranteed immunities from harm.

6 VII

7 That defendants, and each of them, did the acts and things
8 herein alleged pursuant to, and in furtherance of, the conspiracy
9 and agreement herein alleged, and hereinafter and hereinbefore
10 complained of, and under color of authority and pretense of law.

11 VIII

12 By reason of the wrongful, intentional, and malicious acts
13 of defendants, and each of them, and the fright thereby caused
14 plaintiff, plaintiff has suffered extreme and severe mental an-
15 guish and physical pain, and has been injured in mind and body
16 and earning capacity, the nature and extent of which shall be
17 proved at trial, and as incorporated herein under DAMAGES from
18 page 274.

19 IX

20 WHEREFORE, plaintiff demands judgment against defendants,
21 and each of them, the nature, extent, sum and costs of which
22 shall be proved at trial, compensatory and punitive damages.

23 FORTY-NINTH CAUSE OF ACTION

24 I

25 Plaintiff does hereby incorporate and adopt by reference,
26 all allegations set forth in JURISDICTION (page 2); 28 USC §§1343,
27 1346(b); 42 USC §1981 et seq.; Constitutional Amendment XIV.

28 Ronald Reagan-2875
II

29 Plaintiff does hereby incorporate and adopt by reference,
30 all allegations set forth in all causes of action herein, hereinbe-
31 fore and hereinafter complained of, for depriving plaintiff of priv-
32 ileges and immunities under color of authority and pretense of law.

ORIGINAL

1 III

2 Plaintiff is a citizen of the United States, and the amount
3 in controversy exceeds ten thousand dollars.

4 IV

5 Plaintiff does not know the true names and capacities of de-
6 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
7 therefore sues these defendants, and each of them, by such ficti-
8 tious names for damages caused and proximately caused to plaintiff.

9 V

10 In July 1976, defendants STATE OF CALIFORNIA, GOVERNOR EDMUND
11 G. BROWN, JR., and gubernatorial assistant MARC POCHE, wrongfully,
12 unlawfully, intentionally, maliciously, disregarded their duty to-
13 ward plaintiff when plaintiff attempted to communicate criminal
14 acts occurring in the State of California/ Defendant MARC POCHE,
15 in GOVERNOR BROWN's presence, to plaintiff's information and be-
16 lief, threatened plaintiff in a hard ex-U.S. Marine voice: "Get
17 off this phone - everything will be taken care of". Then plain-
18 tiff BRONSON knew that under the color of authority and pretense
19 of law, defendants BROWN and POCHE meant to shortly and immediate-
20 ly send more STATE POLICE OFFICER, AGENTS or EMPLOYEES, or others,
21 to beat, main, harass, assault, attempt to kill, and otherwise
22 severely threaten plaintiff's personal safety. Plaintiff contin-
23 ues to live in fear, alarm and apprehension of bodily harm at the
24 hands of defendant STATE OF CALIFORNIA, or others, under color of
25 authority or pretense of law, to get def. BROWN elected President.

26 VI

27 That defendants, and each of them, knowingly and willfully
28 organized and caused to be organized conspiracy and agreement
29 among themselves, and each of them, and with others, to suppress
30 and wrongfully withhold from law enforcement plaintiff's new life-
31 saving firearms and related technologies by illegally assaulting
32 plaintiff, and to suppress defendant GOVERNOR BROWN's coverup of
Ronald Reagan-2876

ORIGINAL

1 crimes committed in California and in the BROWN ADMINISTRATION
2 of which plaintiff was knowlegeable, to get BROWN elected President.

3 VII

4 That defendants, and each of them, did the acts and things
5 herein alleged pursuant to, and in furtherance of, the conspiracy
6 and agreement herein alleged, and hereinafter and hereinbefore
7 complained of, under color of authority and pretense of law.

8 VIII

9 By reason of the wrongful, intentional, and malicious acts
10 of defendants, and each of them, and others, and the fright there-
11 by caused plaintiff, plaintiff has suffered extreme and severe
12 mental anguish and physical pain, and has been injured in mind and
13 body and earning capacity, the nature and extent of which shall be
14 proved at trial, and as incorporated herein under DAMAGES from
15 page 274.

16 IX

17 WHEREFORE, plaintiff demands judgment against defendants,
18 and each of them, the nature, extent, sum and costs of which
19 shall be proved at trial, compensatory and punitive damages.

20 FIFTIETH CAUSE OF ACTION

21 I

22 Plaintiff does hereby incorporate and adopt by reference,
23 all allegations set forth in JURISDICTION (page 2); 28 USC §§1343,
24 1346(b); 42 USC §1981 et seq.; Constitutional Amendment XIV.

25 II

26 Plaintiff does hereby incorporate and adopt by reference,
27 all allegations set forth in all causes of action herein, hereinbe-
28 fore, hereinafter complained of for loss of privileges and immuni-
ties.

29 III

30 plaintiff is a citizen of the United States, and the amount
31 in controversy exceeds ten thousand dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

Defendants are:

1. Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr.
State Capitol, Sacramento, California.

2. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER, 555 Capitol Mall, Sacramento, California.

3. Def. MARC POCHE, gubernatorial assistant, Office of the Governor, State Capitol, Sacramento, California.

4. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF GUY R. OATES, State Capitol, Sacramento, California.

5. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE OFFICER L.D. SHERWOOD (BADGE NO. 4), State Capitol, Sacramento, California.

6. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE OFFICER S.W. WESTON, State Capitol, Sacramento, California.

7. Other defendants present and not known to plaintiff.

VI

On February 11, 1977, defendants STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, JR., MARC POCHE, ATTORNEY GENERAL EVELLE J. YOUNGER, CALIFORNIA STATE POLICE CHIEF GUY R. OATES, and others, without cause or provocation, retaliated against plaintiff for filing this lawsuit before this Court, and instituted and completed defendant MARC POCHE's threats of bodily harm toward plaintiff. Said defendants, and each of them, wrongfully, unlawfully, maliciously, and contemptuously, under color of authority and pretense of law, used defendants armed CALIFORNIA STATE POLICE OFFICERS L.D. SHERWOOD (BADGE NO. 4) and S.W. WESTON, and others not known to plaintiff, to deprive plaintiff and others of privileges

ORIGINAL

1 and immunities guaranteed to plaintiff as a citizen of the United
2 States, by Amendments I, IV, V, VII, and XIV of the Constitution of
3 the United States, and the Due Process and Equal Protection Claus-
4 es of the Fourteenth Amendment. Defendants, and each of them,
5 interfered with party to this Court proceeding by assaulting
6 plaintiff and others while plaintiff lawfully attended a Cali-
7 fornia administrative hearing at 1006 Fourth Street, Sacramento,
8 California. Said defendants, and each of them, in contempt for
9 judicial and administrative proceedings and parties, "dogged",
10 followed, stalked, obstructed, harassed, abused, assaulted, and
11 otherwise wrongfully pursued plaintiff and others with deadly
12 weapons, preventing plaintiff and others from peaceful lawful
13 assembly, presence and attendance at said administrative hearing.
14 Plaintiff and others were deprived of their rights and not per-
15 mitted to conduct business affairs before the administrative
16 hearing as plaintiff intended and as provided by law. The pre-
17 venting of plaintiff to conduct business before the administrative
18 hearing occurred wrongfully under color of authority and pretense
19 of law by defendants.

20 VII

21 The defendants, and each of them, knowingly and willfully
22 organized and caused to be organized conspiracy and agreement
23 among themselves, and each of them, and with others, to suppress
24 and wrongfully withhold from law enforcement plaintiff's new life-
25 saving firearms and related technologies, to suppress, wrongfully
26 silence, and wrongfully retaliate against plaintiff for filing
27 complaint before this Court, to suppress and wrongfully cover-up
28 GOVERNOR BROWN's wrongful cover-up of crimes committed in Cali-
29 fornia and scandals in the Brown Administration of which plain-
30 tiff is knowledgeable, and for other motives which shall be demon-
31 strated at trial, by illegally assaulting and threatening plain-
32 tiff.

Ronald Reagan-2879

VII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, under color of authority and pretense of law.

VIII

By reason of the wrongful, intentional, and malicious acts of defendants, and each of them, and others, and the wounds and fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

IX

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and compensatory damages and punitive damages, and such other relief as deemed just and proper by this court.

FIFTY-FIRST CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, allegations set forth in JURISDICTION (page 2); 28 USC §§1343, 1346(b); 42 USC §1981 et seq; Constitutional Amendment XIV.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinbefore and hereinafter complained of, for deprivations of privileges and immunities under color of law.

III

Plaintiff is a citizen of the United States; amount in con-

troversty exceeds Ten Thousand Dollars.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

Ronald Reagan-2881

V

Defendants are:

1. Def. STATE OF CALIFORNIA, CALIFORNIA ATTORNEY GENERAL EVELLE J. YOUNGER, 555 Capitol Mall, Sacramento, California.
2. Def. STATE OF CALIFORNIA, "MR. ALEXANDER, OFFICE OF THE ATTORNEY GENERAL, 555 Capitol Mall, Sacramento, California.

VI

On or about January 23, 1975, defendant agent, employee, or servant, "MR. ALEXANDER", refused to log charges of criminal acts (illegal wiretapping, etc.) committed in California, but instead, under color of authority and pretense of law, without cause or provocation, defendant agent, employee or servant wrongfully, willfully, maliciously, and negligently threatened plaintiff with bodily harm. When plaintiff calmed down and shortly called the ATTORNEY GENERAL's OFFICE for "MR. ALEXANDER", plaintiff was advised that there was no such person in the OFFICE OF THE ATTORNEY GENERAL. Plaintiff was immediately fearful and apprehensive for his personal safety in that again defendant ATTORNEY GENERAL YOUNGER had his agents and employees out after plaintiff. As defendants intended, and each of them, plaintiff was quite ill for some days after. Defendants prevented plaintiff from filing his charges.

VII

That from 1972 forward, defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies by illegally assaulting plaintiff

VIII

That defendants, and each of them, did the acts and things herein alleged pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore

ORIGINAL

1 inbefore complained of, in malice, ill will, and acting under
2 color of authority and pretense of law, the result of which was
3 invasion of plaintiff's guaranteed privileges and immunities from
4 police harassment and abuse set forth in Amendments I, IV, V, VI,
5 VII and XIV of the Constitution of the United States.

6 XIV

7 By reason of the wrongful, intentional, and malicious acts,
8 conspiracies and humiliations of plaintiff by defendants, and
9 each of them, and with others, the fright thereby caused plain-
10 tiff to suffer extreme and severe mental anguish and physical
11 pain, and injury in mind and body and earning capacity, the nature
12 and extent of which shall be proved at trial, and as incorporated
13 herein under DAMAGES from page 274.

14 XV

15 WHEREFORE, plaintiff demands judgment against defendants,
16 and each of them, the nature, extent, sum and costs of which
17 shall be proved at trial, and for compensatory and punitive
18 damages, and for such other relief as is deemed just and proper
19 by this Court.

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31 Ronald Reagan-2883

1 FIFTY-SECOND CAUSE OF ACTION

2 I

3 The Court has jurisdiction in this matter under Title 28,
4 United States Code, Secs. 1343, 1346(b), 2671 etseq., for depri-
5 vation of civil rights, assaults by federal police officers acting
6 under color of authority and pretense of law, the enjoinder of
7 unconstitutional actions of state officials, for damages under the
8 Federal Tort Claims Act; controversies to which the United States
9 is a party, United States Constitution, Article III, Section 2;
10 Title 42 United States Code Secs. 1981 et seq., particularly §§
11 1982, 1983, 1985, 1986, interference with Civil Rights; redress for
12 violations of the FIRST, FOURTH, and SIXTH Amendments, and the
13 Due Process and Equal Protection Clauses of the FOURTEENTH Amend-
14 ment to the United States Constitution, Title 28, United States
15 Code, Secs. 1331 et seq.

16 II

17 Further, jurisdiction of the Court is invoked under Title
18 28, United States Code, Secs. 1331 and 1343, this being a suit in
19 equity authorized by law; Title 42, United States Code, Sec. 1983,
20 to be commenced by any citizens of the United States or other per-
21 son within the jurisdiction thereof to redress the deprivation
22 under color of statute, ordinance, regulation, custom or usage
23 of a State of rights, privileges, and immunities secured by the
24 Constitution and Laws of the United States. The rights, privi-
25 leges, and immunities sought herein to be redressed are those
26 secured by the First Amendment, and the Due Process and Equal Pro-
27 tection Clauses of the Fourteenth Amendment to the United States
28 Constitution. The matter in controversy, exclusive of interest
29 and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

Ronald Reagan-2884

30 III

31 Further, jurisdiction of the Court is invoked because acts of
32 defendants, under color of law and authority, deprived plaintiff

1 of the privileges and immunities guaranteed to plaintiff by Amend-
2 ments I, IV, VI, VII, and XIV to the United States Constitution.

3 IV

4 Plaintiff BRONSON is a citizen of the United States, and the
5 amount in controversy exceeds Ten Thousand Dollars.

6 V

7 Plaintiff does not know the true names and capacities of de-
8 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
9 therefore sues these defendants, and each of them, by such ficti-
10 tious names for damages caused and proximately caused to plaintiff.

11 VI -A

12 Defendants are:

13 1. Def. FEDERAL PROTECTIVE SERVICE (FPS) of the UNITED STATES
14 GENERAL SERVICES ADMINISTRATION (GSA). Headquarters of the GSA
15 are Washington, D.C. Local headquarters of the FEDERAL PROTECTIVE
16 SERVICE (FPS) is 650 Capitol Mall, Sacramento, California.

17 2. Defs. OFFICER CLEMONS (BADGE 3327), OFFICER JAMES CHAS-
18 TAINE, and CLARENCE SNELSON, uniformed agents and employees of the
19 Sacramento FEDERAL PROTECTIVE SERVICE office.

20 3. Defs. OFFICER GREER and OFFICER W.W. SMITH (BADGE 30),
21 uniformed agents and employees of LUV SECURITY SERVICE, Sacramento,

22 4. Def. LUV SECURITY SERVICE, Sacramento, California, under
23 contract to the defendant FEDERAL PROTECTIVE SERVICE to perform
24 services as contracted. Represented in Sacramento, California
25 by attorney Michael Sands.

26 5. Defs. FEDERAL BUREAU OF INVESTIGATION and DIRECTOR L.
27 PATRICK GRAY, headquartered in Washington, D.C., with local ad-
28 dress of 2800 Cottage Way, Sacramento, California.

29 6. Def. "VICTOR MARTINEZ".

30 7. Other defendants not known to plaintiff.

31 Ronald Reagan-2885

ORIGINAL

VI -B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 23 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV to the Constitution of the United States.

VI -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

Ronald Reagan-2886

1 VII

2 That on August 22, 1975, in the County of Sacramento, United
3 States Post Office, 801 I Street, Sacramento, California, defen-
4 dants, and each of them, under color of authority and pretense of
5 law, and armed with deadly weapons, and each of them, maliciously,
6 wantonly, willfully, recklessly, wrongfully, unlawfully, and with-
7 out cause or provocation, violently attacked, beat, strangled,
8 handcuffed, illegally search and seized, falsely arrested, false-
9 ly imprisoned, restrained, and struck plaintiff in and about the
10 face, head and other parts of the body, and made other multiple
11 physical abuses and injuries to plaintiff which required plaintiff
12 to go to the hospital for care and treatment.

13 VIII

14 Such restraint of plaintiff's liberty was made without arrest,
15 without warrant or other legal process and was unlawful, in that
16 no crime had been committed and in that there was no reason or
17 cause for belief that plaintiff had committed any crime.

18 IX

19 In doing all the acts and things aforesaid defendants, and
20 each of them, acted wilfully and maliciously.

21 X

22 Plaintiff was restrained of his liberty by being handcuffed
23 and held incommunicado in a room in the United States Post Office
24 for about one hour, after which time plaintiff was released in
25 the custody of defendants FPS OFFICER CHASTAINE and LUV OFFICER
26 GREER.

Ronald Reagan-2887

27 XI

28 Defendants FPS OFFICER JAMES CHASTAINE and LUV OFFICER GREER
29 forcibly took plaintiff from the United States Post Office and
30 forcibly took plaintiff to his business automobile parked in a
31 private parking lot one block away. Plaintiff was menaced by said
32 defendants, and each of them, for some time at plaintiff's busi-

1 ness automobile. Plaintiff was made to fear for his continued
2 personal safety from deadly weapons or fists, and fear for the
3 personal safety of innocent by-standers. Plaintiff was not ar-
4 rested.

5 XII

6 That by reason of said acts plaintiff was placed in great
7 fear for his life and physical well being, and the lives and physi-
8 cal well being of innocent by-standers, defendants at all times
9 having the present ability to continue to beat, strangle, hand-
10 cuff, restrain, attack, and otherwise carry out their threats to
11 kill plaintiff, acting under color of authority and pretense of
12 law.

13 XIII

14 The acts of defendants, under color of law, and under color
15 of their authority as federal police officers of the UNITED STATES
16 GOVERNMENT, as herein set out, deprived plaintiff of the privi-
17 leges and immunities guaranteed to plaintiff as a citizen of the
18 United States, by Amendments I, IV, V, VI, VII, and XIV of the Con-
19 stitution of the United States.

20 XIV

21 That defendants, and each of them, and with others, knowingly
22 and willfully and maliciously organized and caused to be organized
23 conspiracy and agreement among themselves, to suppress and wrong-
24 fully withhold from law enforcement plaintiff's new lifesaving
25 firearms and related technologies by illegally assaulting, attack-
26 ing, beating, and attempting to murder plaintiff under color of
27 authority and pretense of law.

28 Ronald Reagan-2888

177.

29 That defendants, and each of the, did the acts and things
30 herein alleged pursuant to, and infurtherance of, the conspiracy
31 and agreement herein set forth, and hereinafter and hereinbefore
32 complained of as incorporated in all causes of action herein,

1 and under color of authority and pretense of law, deprived plain-
2 tiff of the privileges and immunities guaranteed to plaintiff by
3 Amendments I, VI, V, VI, VII, and XIV of the Constitution of the
4 United States.

5 XVI

6 By reason of the wrongful, intentional, willful, and mali-
7 cious acts of defendants, and each of them, and the wounds and
8 fright thereby caused plaintiff, plaintiff has suffered extreme
9 and severe mental anguish and physical pain, and has been injured
10 in mind and body and earning capacity, and for these reasons of
11 malice, oppression, and ill will, and humiliation of plaintiff,
12 plaintiff is entitled to and asks for punitive or exemplary damages
13 which shall be proved at trial, and as incorporated herein under
14 DAMAGES on page 274.

15 XVII

16 Prior to said wrongful and unlawful beating of plaintiff and
17 restraint of plaintiff's liberty, plaintiff had enjoyed a good
18 reputation in and about the City of Sacramento, particularly for
19 honesty and good conduct.

20 XVIII

21 That by reason of the injuries inflicted by defendants, and
22 each of them, plaintiff was compelled to and did expend sums for
23 medical care and the employment of physicians and surgeons; by
24 virtue of which plaintiff has incurred debts in amounts to be
25 proved at trial, which sums were necessary, reasonable and proper.

26 XIX

27 That by reason of the injuries inflicted upon plaintiff by
28 defendants, and each of them, plaintiff will continue to suffer
29 great pain and anguish of body and mind, and permanent disfigure-
30 ment, the sum of which shall be proved at trial.

31 Ronald Reagan-2889

32 WHEREFORE, plaintiff demands judgment against defendants,

1 and each of them, in the sum and costs which shall be proved at
2 trial, and compensatory and punitive damages, and such other re-
3 lief as deemed just and proper by this Court.

4
5 FIFTY-THIRD CAUSE OF ACTION

6 I

7 plaintiff does hereby incorporate and adopt by reference,
8 all allegations set forth in Paragraphs I through VI, JURISDIC-
9 TION (page 2); 23 USC §§1343, 1346(b); 42 USC §1981 et seq.;
10 Amendments I, IV, V, VI, VII and XIV to the United States Constitution.

11 II

12 plaintiff does hereby incorporate and adopt by reference,
13 all allegations set forth in all causes of action herein complain-
14 ed of for deprivations of privileges and immunities under color
15 of authority and pretense of law; United States is a party.

16 III

17 plaintiff is a citizen of the United States, and the amount
18 in controversy exceeds Ten Thousand Dollars (\$10,000.00).

19 IV

20 Plaintiff does not know the true names and capacities of de-
21 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
22 therefore sues these defendants, and each of them, by such ficti-
23 tious names for damages caused and proximately caused to plaintiff.

24 V

25 Defendants are:

26 1. Def. STATE OF CALIFORNIA, STATE CONTROLLER HOUSTON I.
27 FLOURNOY, State Capitol, Sacramento, California.

28 2. Def. STATE OF CALIFORNIA, STATE ATTORNEY GENERAL EVELLE
29 J. YOUNGER, 555 Capitol Mall, Sacramento, California.

30 3. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF
31 GUY R. CATES, State Capitol, Sacramento, California.

32 Ronald Reagan-2890

1 VI

2 On or about January 23, 1974, defendants, without cause or
3 provocation and under color of authority and pretense of law,
4 wrongfully, unlawfully, intentionally, and violently assaulted
5 plaintiff with deadly weapons on private business property where
6 the STATE OF CALIFORNIA had no business. Defendants, and each of
7 them, sent state agents and employees in two (2) cars to willful-
8 ly, maliciously, unlawfully, and violently use force on plaintiff.
9 Defendants agents and employees trespassed on private business
10 property and restrained plaintiff from leaving building. Defen-
11 dants agents and employees returned to their automobiles and
12 sat in the cars for some time in front of the building, assault-
13 ing, humiliating, restraining, outraging, and embarrassing plain-
14 tiff, and prevented plaintiff from conducting his lawful business
15 activities.

16 VII

17 Such restraint of plaintiff's liberty was made without war-
18 rant or other legal process and was unlawful, in that no crime
19 had been committed and in that there was no reason or cause for
20 belief that plaintiff had committed any crime.

21 VIII

22 That defendants, and each of them, knowingly and willfully
23 organized and caused to be organized conspiracy and agreement
24 among themselves, and each of them, and with others, to suppress
25 and wrongfully withhold from law enforcement plaintiff's new life-
26 saving firearms and related technologies, by illegally restrain-
27 ing plaintiff.

Ronald Reagan-2891

28 IX

29 In doing all the acts and things aforesaid defendants, and
30 each of them, acted willfully and maliciously, and in ill will.

31 X

32 Defendants restrained plaintiff's liberty for some time.

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XI

Prior to said restraint of plaintiff's liberty by defendants' ill will toward plaintiff, and the public humiliation to plaintiff, plaintiff had enjoyed a good reputation in and about the CITY OF SACRAMENTO, particularly for honesty and good conduct.

XII

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies, by illegally restraining plaintiff.

XIII

That defendants, and each of them, did the acts and things herein set forth pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, in malice, ill will, acting under color of authority and pretense of law, the result of which was invasion of plaintiff's guaranteed privileges and immunities from police harassment and abuse set forth in Amendments I, IV, V, VI, VII and XIV.

XIV

By reason of the wrongful, intentional, malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, and nature and extent of which shall be proved at trial, incorporating herein DAMAGES, page 274.

Ronald Reagan-2892

XV

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

1 FIFTY-FOURTH CAUSE OF ACTION

2 I

3 Plaintiff does hereby incorporate and adopt by reference,
4 all allegations set forth in Paragraph I through VI, JURRISDIC-
5 TION (page 2); Title 23, United States Code, Secs. 1343, 1346(b);
6 Title 42, United States Code, Secs. 1931 et seq.; Amendments I,
7 IV, V, VI, VII and XIV to the United States Constitution.

8 II

9 Plaintiff does hereby incorporate and adopt by reference,
10 all allegations set forth in all causes of action herein complain-
11 ed of for deprivations of privileges and immunities under color
12 of authority and pretense of law.

13 III

14 Plaintiff is a citizen of the United States, and the amount
15 in controversy exceeds Ten Thousand Dollars, exclusive of interests
16 and costs.

17 IV

18 Plaintiff does not know the true names and capacities of de-
19 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
20 therefore sues these defendants, and each of them, by such ficti-
21 tious names for damages caused and proximately caused to plaintiff.

22 V

23 Defendants are:

- 24 1. Def. STATE OF CALIFORNIA, STATE CONTROLLER HOUSTON I.
25 FLOURNOY, State Capitol, Sacramento, California.
- 26 2. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF
27 GUY R. OATES, State Capitol, Sacramento, California.
- 28 3. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNG-
29 ER, 555 Capitol Mall, Sacramento, California.
- 30 4. Def. STATE OF CALIFORNIA, STATE POLICE OFFICERS unknown
31 to plaintiff.

Ronald Reagan-2893

VI

On or about February 9, 1974, defendants, without cause or provocation and under color of authority and pretense of law, wrongfully, unlawfully, intentionally, and violently assaulted plaintiff with deadly weapons in the California State Capitol. Defendants CALIFORNIA STATE POLICE restrained plaintiff of his liberty in the Capitol and refused to permit plaintiff to leave the offices of defendant STATE POLICE when plaintiff demanded to be allowed to leave the office. Said defendants refused to permit plaintiff to exercise his right to freedom of speech, due process of law, and the right of plaintiff to conduct plaintiff's lawful business in a lawful manner in the State Capitol. Defendants intimidated and interfered with plaintiff under the pretense of authority or law, and caused plaintiff to become so sick, ill and disheartened that plaintiff was caused to leave the Capitol without completing plaintiff's lawful business.

VII

Such restraint of plaintiff's liberty was made without warrant or other legal process and was unlawful, in that no crime had been committed and in that there was no reason or cause for belief that plaintiff had committed any crime.

VIII

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies, by illegally restraining plaintiff.

Ronald Reagan-2894

IX

In doing all the acts and things aforesaid, defendants, and each of them, acted willfully and maliciously, and in ill will.

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X

Defendants restrained plaintiff's liberty for about one hour.

XI

Prior to said restraint of plaintiff's liberty by defendants' ill will toward plaintiff, and the public humiliation to plaintiff, plaintiff had enjoyed a good reputation in and about the CITY OF SACRAMENTO, particularly for honesty and good conduct.

XII

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new life-saving firearms and related technologies, by illegally restraining plaintiff.

XIII

That defendants, and each of them, did the acts and things herein set forth pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, in malice, ill will, acting under color of authority and pretense of law, the result of which was invasion of plaintiff's guaranteed privileges and immunities from police harassment and abuse set forth in Amendments I, IV, V, VI, VII and XIV.

XIV

By reason of the wrongful, intentional, malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

Ronald Reagan-2895

1 VI

2 On or about September 29, 1972, defendants, without cause or
3 provocation and under color of authority and pretense of law,
4 wrongfully, unlawfully, intentionally, maliciously, and violently
5 assaulted plaintiff with deadly weapons in the United States Post
6 Office, 301 I Street, Sacramento, California. Defendants re-
7 strained plaintiff of his liberty, obstructed plaintiff in the
8 conduct of plaintiff's business, harassed, abused, intimidated,
9 embarrassed, humiliated, and interfered with plaintiff.

10 VII

11 Such restraint of plaintiff's liberty was made without war-
12 rant or other legal process and was unlawful, in that no crime
13 had been committed and in that there was no reason or cause for
14 belief that plaintiff had committed any crime.

15 VIII

16 In doing all the acts and things aforesaid defendants, and
17 each of them, acted willfully and maliciously, and in ill will.

18 IX

19 That defendants, and each of them, knowingly and willfully
20 organized and caused to be organized conspiracy and agreement
21 among themselves, and each of them, and with others, to suppress
22 and wrongfully withhold from law enforcement plaintiff's new life-
23 saving firearms and related technologies, by illegally restraining
24 plaintiff.

25 X

26 Defendants, and each of them, restrained plaintiff's liberty
27 for approximately one-half hour.

Ronald Reagan-2897

28 XI

29 Prior to said restraint of plaintiff's liberty by defendants
30 ill will toward plaintiff, and the public humiliation to plain-
31 tiff, plaintiff had enjoyed a good reputation in and about the
32 CITY OF SACRAMENTO, particularly for honesty and good conduct.

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XII

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to illegally restrain plaintiff and suppress plaintiff's technologies.

XIII

That defendants, and each of them, did the acts and things herein set forth pursuant to, and in furtherance of, the conspiracy and agreement herein alleged, and hereinafter and hereinbefore complained of, in malice, ill will, and acting under color of authority and pretense of law, the result of which was invasion of plaintiff's guaranteed privileges and immunities from police harassment and abuse set forth in Amendments I, VI, V, VI, VII, IV and XIV of the United States Constitution.

XIV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XV

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2898

ORIGINAL

FIFTY-SIXTH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

Ronald Reagan-2899

III -A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

1 of the privileges and immunities guaranteed to plaintiff by
2 Amendments I, IV, V, VI, VII, and XIV of the Constitution of the
3 United States.

4 III - B

5 Plaintiff does hereby incorporate and adopt by reference,
6 all allegations set forth in JURISDICTION (page 2); Title 28,
7 USC, Sections 1343 and 1346(b); Title 42, USC, Section 1981 et
8 seq.; Amendments I, IV, V, VI, VII, and XIV to the United States
9 Constitution.

10 III - C

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action herein, herein-
13 after and heretofore complained of, for deprivations of privi-
14 leges and immunities under color of authority and pretense of
15 law.

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IV

Plaintiff BRONSON is a citizen of the united states, and the UNITED STATES IS A PARTY to this controversy.

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Defendants are:

1. Def. FEDERAL BUREAU OF INVESTIGATION (FBI), United States Department of Justice, headquarters Washington, D.C. Local address is 2300 Cottage Way, Sacramento, California.
2. Def. FBI DIRECTOR L. PATRICK GRAY, Washington, D.C.
3. Def. JOHN REED, FBI SPECIAL-AGENT-IN-CHARGE. 2300 Cottage Way, Sacramento, California.
4. Other FEDERAL BUREAU OF INVESTIGATION AGENTS not known to plaintiff.

Ronald Reagan-2901

VII

On or about September 30, 1972, defendants FBI, under color of authority and pretense of law, and armed with deadly weapons, forcibly, loudly, repeatedly banged on business door, maliciously, wantonly, willfully, recklessly, wrongfully, unlawfully, and without cause or provocation, trespassed on private business property to assault plaintiff, and restrained plaintiff from leaving the business property. Defendants FBI agents and employees sat in an automobile for some time preventing plaintiff from leaving for fear plaintiff would suffer bodily harm.

VIII

Such restraint of plaintiff's liberty was made without arrest,

1 without warrant or other legal process and was unlawful, in that
2 no crime had been committed and in that there was no reason or
3 cause for belief that plaintiff had committed any crime.

4 IX

5 That defendants, and each of them, knowingly and willfully
6 organized and caused to be organized conspiracy and agreement
7 among themselves, and each of them, and with others, to suppress
8 and wrongfully withhold from law enforcement plaintiff's new
9 lifesaving firearms and related technologies by illegally
10 restraining plaintiff.

11 X

12 That defendants, and each of them, did the acts and things
13 herein alleged pursuant to, and in furtherance of, the conspiracy
14 and agreement herein alleged, and hereinafter and hereinbefore
15 complained of, acting under color of authority and pretense of
16 law, in malice, ill will and without reasonable cause, the result
17 of which was invasion of plaintiff's guaranteed privileges and
18 immunities from police harassment and abuse set forth in Amend-
19 ments I, IV, V, VI, VII and XIV of the United States Constitution.

20 XI

21 Defendants, and each of the, restrained plaintiff's liberty
22 for

Ronald Reagan-2902

23 XII

24 By reason of the wrongful, intentional, malicious acts, con-
25 spiracies and humiliations of plaintiff by defendants, and each of
26 them, and others, the fright thereby caused plaintiff to suffer
27 extreme and severe mental anguish and physical pain, and injury
28 to mind and body and earning capacity, and the nature and extent
29 of which shall be proved at trial.

30 XIII

31 Prior to said restraint of plaintiff's liberty by defendants
32 ill will toward plaintiff, and the public humiliation to plain-

1 tiff, plaintiff had enjoyed a good reputation in and about the
2 CITY OF SACRAMENTO, particularly for honesty and good conduct.

3 XIV

4 WHEREFORE, plaintiff demands judgment against defendants,
5 and each of them, the sum and costs of which shall be proved at
6 trial, and for compensatory and punitive damages, and for such
7 other relief as is deemed just and proper by this Court, and
8 as incorporated herein under DAMAGES from page 274.

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Ronald Reagan-2903

ORIGINAL

FIFTY-SEVENTY CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

Ronald Reagan-2904

III -A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

1 of the privileges and immunities guaranteed to plaintiff by
2 Amendments I, IV, V, VI, VII, and XIV of the Constitution of the
3 United States.

4 III - B

5 Plaintiff does hereby incorporate and adopt by reference,
6 all allegations set forth in JURISDICTION (page 2); Title 28,
7 USC, Sections 1343 and 1346(b); Title 42, USC, Section 1981 et
8 seq.; Amendments I, IV, V, VI, VII, and XIV to the United States
9 Constitution.

10 III - C

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action herein, herein-
13 after and hereinbefore complained of, for deprivations of privi-
14 leges and immunities under color of authority and pretense of
15 law.

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Ronald Reagan-2905

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Defendants are:

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32

Plaintiff BRONSON is a citizen of the United States, and the UNITED STATES is a party to this controversy.

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

1. Def. FEDERAL BUREAU OF INVESTIGATION (FBI), United States Department of Justice, headquarters Washington, D.C. Local address is 2800 Cottage Way, Sacramento, California.

2. Def. FBI DIRECTOR L. PATRICK GRAY, Washington, D.C.

3. Def. JOHN REED, FBI SPECIAL AGENT-IN-CHARGE, 2800 Cottage Way, Sacramento, California; agent "TOMMY RAY".

4. Other FBI agents not known to plaintiff.

VII

On or about October 4, 1972, defendants FBI, under color of authority and pretense of law, and armed with deadly weapons, and each of them, without cause or provocation, wrongfully, maliciously, wantonly, willfully, recklessly, harassed, abused, intimidated, embarrassed, obstructed, humiliated, restrained, and otherwise interfered with plaintiff in the United States Post Office, 3th and I Streets, Sacramento, and stopped plaintiff in plaintiff's conduct of plaintiff's lawful business in the Post Office.

Ronald Reagan-2906

VIII

Plaintiff was obstructed from leaving the Post Office as he wished by said two (2) FBI agents, acting under color of authority

1 and pretense of law. When plaintiff managed to get away from the
2 FBI restraint in the Post Office, defendant's FBI agent "TOMMY
3 RAY" stalked and "dogged" plaintiff down the streets to Sacramento
4 City Hall, followed plaintiff up the stairs and into the City Hall
5 building. Agent "RAY" refused to not follow plaintiff.

6 IX

7 Such restraint of plaintiff's liberty was made without war-
8 rant or other legal process and was unlawful, in that no crime
9 had been committed and in that there was no reason or cause for
10 belief that plaintiff had committed any crime.

11 X

12 That defendants, and each of them, knowingly and willfully
13 organized and caused to be organized conspiracy and agreement
14 among themselves, and each of them, and with others, to suppress
15 and wrongfully withhold from law enforcement plaintiff's new life-
16 saving firearms and related technologies, by illegally restrain-
17 ing plaintiff.

18 XI

19 Defendants, and each of them, restrained plaintiff's liberty
20 for approximately one-half hour. in the Post Office.

21 XII

22 In doing all the acts and things aforesaid defendants, and
23 each of them, acted willfully and maliciously, and in ill will.

24 XIII

25 Prior to said restraint of plaintiff's liberty by defendants'
26 ill will toward plaintiff, and the public humiliation to plain-
27 tiff, plaintiff had enjoyed a good reputation in and about the
28 CITY OF SACRAMENTO, particularly for honesty and good conduct.

Ronald Reagan-2907

29 XIV

30 That defendants, and each of them, did the conspiracies,
31 acts and things herein set forth pursuant to, and in furtherance
32 of, the conspiracy and agreement herein, and hereinafter and here-

1 inbefore complained of, in malice, ill will, and acting under
2 color of authority and pretense of law, the result of which was
3 invasion of plaintiff's guaranteed privileges and immunities from
4 police harassment and abuse set forth in Amendments I, IV, V, VI,
5 VII and XIV of the Constitution of the United States.

6 XV

7 By reason of the wrongful, intentional, and malicious acts,
8 conspiracies and humiliations of plaintiff by defendants, and
9 each of them, and with others, the fright thereby caused plain-
10 tiff to suffer extreme and severe mental anguish and physical
11 pain, and injury in mind and body and earning capacity, the nature
12 and extent of which shall be proved at trial, and as incorporated
13 herein under DAMAGES from page 274.

14 XVI

15 WHEREFORE, plaintiff demands judgment against defendants,
16 and each of them, the nature, extent, sum and costs of which
17 shall be proved at trial, and for compensatory and punitive
18 damages, and for such other relief as is deemed just and proper
19 by this Court.

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FIFTY-EIGHTH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III -A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

1 of the privileges and immunities guaranteed to plaintiff by
2 Amendments I, IV, V, VI, VII, and XIV of the Constitution of the
3 United States.

4 III - B

5 Plaintiff does hereby incorporate and adopt by reference,
6 all allegations set forth in JURISDICTION (page 2); Title 28,
7 USC, Sections 1343 and 1346(b); Title 42, USC, Section 1981 et
8 seq.; Amendments I, IV, V, VI, VII, and XIV to the United States
9 Constitution.

10 III - C

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action herein, herein-
13 after and hereinbefore complained of, for deprivations of privi-
14 leges and immunities under color of authority and pretense of
15 law.

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Ronald Reagan-2910

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3 IV

4 Plaintiff BRONSON is a citizen of the United States, and the
5 United States is a party to this controversy.

6 V

7 Plaintiff does not know the true names and capacities of de-
8 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
9 therefore sues these defendants, and each of them, by such ficti-
10 tious names for damages caused and proximately caused to plaintiff.

11 VI

12 Defendants are:

- 13 1. Def. FEDERAL BUREAU OF INVESTIGATION.
14 2. Def. FBI DIRECTOR L. PATRICK GRAY.
15 3. Def. JOHN REED, FBI SPECIAL AGENT-IN-CHARGE, Sacramento.
16 4. Def. WILLIAM J. KINNEY, CHIEF OF CITY OF SACRAMENTO
17 POLICE DEPARTMENT.
18 5. Other FBI agents, and others, not known to plaintiff.

19 VII

20 On or about October 4, 1972, defendants FBI, under color
21 of authority and pretense of law, and armed with drawn deadly
22 weapons (handguns, rifles, etc.), without cause or provocation,
23 retaliated against plaintiff for plaintiff's insistence that the
24 FBI immediately stop harassment and abuse of Plaintiff BRONSON.
25 FBI AGENT JOHN REED, and other agents, trespassed on private
26 business property and forcibly, violently, loudly, wrongfully,
27 unlawfully, maliciously and wantonly, "surrounded the building
28 in which plaintiff was conducting business. Defendants FBI for-
29 cibly and repeatedly banged on the door, yelled out loud to plain-
30 tiff their threats of bodily harm, incessantly forced the tele-
31 phone to ring, and ran all around the building, behind their
32 cars, into the streets and alleys.

VIII

Plaintiff's liberty was restrained in this humiliating manner for several hours.

IX

Such restraint of plaintiff's liberty was made without warrant or other legal process and was unlawful, in that no crime had been committed and in that there was no reason or cause for belief that plaintiff had committed any crime. PLAINTIFF WAS NOT AND NEVER HAS BEEN ARRESTED.

X

That defendants, and each of them, knowingly and willfully organized and caused to be organized conspiracy and agreement among themselves, and each of them, and with others, to suppress and wrongfully withhold from law enforcement plaintiff's new lifesaving firearms and related technologies, by illegally restraining plaintiff.

Ronald Reagan-2912

XI

In doing all the acts and things aforesaid defendants, and each of them, acted willfully and maliciously, and in ill will.

XII

Prior to said restraint of plaintiff's liberty by defendants' ill will toward plaintiff, and the public humiliation to plaintiff, plaintiff had enjoyed a good reputation in and about the CITY OF SACRAMENTO, particularly for honesty and good conduct.

XIII

That defendants, and each of them, did the conspiracies, acts and things herein set forth pursuant to, and in furtherance of, the conspiracy and agreement herein, and hereinafter and hereinbefore complained of, in malice, ill will, and acting under color of authority and pretense of law, the result of which was invasion of plaintiff's guaranteed privileges and immunities from

1 police harassment and abuse set forth in Amendments I, IV, V, VI,
2 VII and XIV of the United States Constitution.

3 XIV

4 By reason of the wrongful, intentional, and malicious acts,
5 conspiracies and humiliations of plaintiff by defendants, and
6 each of them, and with others, the fright thereby caused plain-
7 tiff to suffer extreme and severe mental anguish and physical
8 pain, and injury in mind and body and earning capacity, the
9 nature and extent of which shall be proved at trial, and as
10 incorporated herein under DAMAGES from page 274.

11 XV

12 WHEREFORE, plaintiff demands judgment against defendants,
13 and each of them, the nature, extent, sum and costs of which
14 shall be proved at trial, and for compensatory and punitive
15 damages, and for such other relief as is deemed just and proper
16 by this Court.

17 FIFTY-NINTH CAUSE OF ACTION

18 I

19 The Court has jurisdiction in this matter under corrupt
20 practices clauses of the Federal Election Campaign Act of 1971,
21 as amended in 1972, 1974, and Federal Corrupt Practices Act,
22 Title 18 of the United States Code (Annotated), especially Sec-
23 tions 610, et seq., and the California Political Reform Act of
24 1974, Title 9 of the Government Code, Sections 81000 et seq.

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Ronald Reagan-2913

II

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

III

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

IV -A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

ORIGINAL

1 of the privileges and immunities guaranteed to plaintiff by
2 Amendments I, IV, V, VI, VII, and XIV of the Constitution of the
3 United States.

4 IV. - B

5 Plaintiff does hereby incorporate and adopt by reference,
6 all allegations set forth in JURISDICTION (page 2); Title 28,
7 USC, Sections 1343 and 1346(b); Title 42, USC, Section 1981 et
8 seq.; Amendments I, IV, V, VI, VII, and XIV to the United States
9 Constitution.

10 IV. - C

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action herein, herein-
13 after and hereinbefore complained of, for deprivations of privi-
14 leges and immunities under color of authority and pretense of
15 law.

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V

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars.

VI

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, AND therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VII

Defendants are:

1. Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr., State Capitol, Sacramento, California.
2. Def. STATE OF CALIFORNIA, STATE ATTORNEY GENERAL EVELLE J. YOUNGER, 555 Capitol Mall, Sacramento, California.
3. Def. STATE OF CALIFORNIA, STATE POLICE, STATE POLICE CHIEF GUY R. OATES, State Capitol, Sacramento, California.
4. Def. STATE OF CALIFORNIA, STATE POLICE OFFICER L.D. SHERWOOD (BADGE NO. 4), State Capitol, Sacramento, California.
5. Def. STATE OF CALIFORNIA, STATE POLICE OFFICER S.W. WESTON, State Capitol, Sacramento, California.

Ronald Reagan-2916

VIII

On February 11, 1977, defendants, and each of them, wrongfully, willfully, unlawfully, and maliciously took part in active, politically corrupt practices against plaintiff in criminal attempts to coverup GOVERNOR EDMUND G. BROWN's coverup of Brown Administration scandals known to plaintiff in said Defendant GOVERNOR BROWN's bids for election to the Office of President of the United States and reelection to Office of Governor of the

Ronald Reagan-2917

1 State of California. Without provocation or cause, and acting
2 under color of authority and pretense of law, defendants retali-
3 ated against plaintiff for filing this lawsuit before this Court,
4 and instituted and completed defendant MARC POCHE's threats of
5 bodily harm toward plaintiff while plaintiff lawfully attended
6 an administrative hearing at 1006 Fourth Street, Sacramento, CA.
7 Said defendants, and each of them, wrongfully, unlawfully, mali-
8 ciously, and contemptuously, under color of authority and pre-
9 tense of law, used defendants armed CALIFORNIA STATE POLICE OFFI-
10 CERS L.D. SHERWOOD and S.W. WESTON, and others not known to plain-
11 tiff, to deprive plaintiff and others of privileges and immuni-
12 ties guaranteed to plaintiff as a citizen of the United States,
13 by Amendments, I, IV, V, VI, VII, and XIV of the United States Con-
14 stitution, and the Due Process and Equal Protection Clauses of
15 the Fourteenth Amendment. Defendants, and each of them, inter-
16 ferred with party to this Court proceeding by assaulting and re-
17 straining plaintiff and others before, during and after the admin-
18 istrative hearing. Said defendants, and each of them, in con-
19 tempt for judicial and administrative proceedings and parties,
20 "dogged", followed, stalked, obstructed, harassed, abused, re-
21 strained, assaulted, and otherwise wrongfully intimidated and pur-
22 sued plaintiff and others with deadly weapons, preventing plain-
23 tiff and others from peaceful lawful assembly, presence and atten-
24 dance at said administrative hearing. Plaintiff and others were
25 deprived of their rights and not permitted to conduct business
26 affairs before the administrative hearing as plaintiff intended
27 and as provided by law. The preventing of plaintiff to conduct
28 business before the administrative hearing occurred in a corrupt
29 political retaliation against plaintiff by GOVERNOR BROWN under
30 color of authority and pretense of law.

31 III

32 Such restraint of plaintiff's liberty was made without war-

1 rant or other legal process and was unlawful, in that no crime
2 had been committed and in that there was no reason or cause for
3 belief that plaintiff had committed any crime.

4 X

5 That defendants, and each of them, knowingly and willfully
6 organized and caused to be organized conspiracy and agreement
7 among themselves, and each of them, and with others, to suppress
8 and wrongfully withhold from law enforcement plaintiff's new
9 lifesaving firearms and related technologies, by illegally
10 restraining plaintiff.

11 XI

12 Defendants, and each of them, restrained Plaintiff's liberty
13 for approximately two(2) hours.

14 XII

15 In doing all the acts and things aforesaid defendants, and
16 each of them, acted willfully and maliciously, and in ill will.

17 XIII

18 Prior to said restraint of plaintiff's liberty by defendants
19 ill will toward plaintiff, and the public humiliation to plain-
20 tiff, plaintiff had enjoyed a good reputation in and about the
21 CITY OF SACRAMENTO, particularly for honesty and good conduct.

Ronald Reagan-2918

22 XIV

23 That defendants, and each of them, did the conspiracies,
24 acts and things herein set forth pursuant to, and in furtherance
25 of, the conspiracy and agreement herein, and hereinafter and here-
26 inbefore complained of, and the conspiracy and agreement herein
27 to get defendant GOVERNOR BROWN elected President and reelected
28 Governor by by covering up Brown Administration scandals and
29 crimes, in malice, ill will, and acting under color of authority
30 and pretense of law, the result of which was invasion and re-
31 straint of plaintiff's guaranteed privileges and immunities from
32 corrupt campaign political practices and police harassment and

1 abuse set forth in Amendments I, IV, V, VI, VII, and XIV of the United
2 States Constitution, and the Equal Protection and Due Process
3 Clauses of the Fourteenth Amendment.

4 XIV

5 By reason of the wrongful, intentional, and malicious acts,
6 conspiracies and humiliations of plaintiff by defendants, and
7 each of them, and with others, the fright thereby caused plain-
8 tiff to suffer extreme and severe mental anguish and physical
9 pain, and injury in mind and body and earning capacity, the
10 nature and extent of which shall be proved at trial, and as
11 incorporated herein under DAMAGES from page 274.

12 XVI

13 WHEREFORE, plaintiff demands judgment against defendants,
14 and each of them, the nature, extent, sum and costs of which
15 shall be proved at trial, and for compensatory and punitive
16 damages, and for such other relief as is deemed just and proper
17 by this Court.

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28 Ronald Reagan-2919
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ORIGINAL

SIXTIETH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.; Federal Tort Claims Act.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

ORIGINAL

1 of the privileges and immunities guaranteed to plaintiff by Amend-
2 ments I, IV, VI, VII, and XIV to the United States Constitution.

3 IV

4 Plaintiff BRONSON is a citizen of the United States, and the
5 amount in controversy exceeds Ten Thousand Dollars, U.S. a party.

6 V

7 Plaintiff does not know the true names and capacities of de-
8 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
9 therefore gues these defendants, and each of them, by such ficti-
10 tious names for damages caused and proximately caused to plaintiff.

11 VI -A

12 Defendants are:

13 1. Def. FEDERAL PROTECTIVE SERVICE (FPS) of the UNITED STATES
14 GENERAL SERVICES ADMINISTRATION (GSA). Headquarters of the GSA
15 are Washington, D.C. Local headquarters of the FEDERAL PROTECTIVE
16 SERVICE (FPS) is 650 Capitol Mall, Sacramento, California.

17 2. Defs. OFFICER CLEMONS (BADGE 3327), OFFICER JAMES CHAS-
18 TAINE, and CLARENCE SNELSON, uniformed agents and employees of the
19 Sacramento FEDERAL PROTECTIVE SERVICE office.

20 3. Defs. OFFICER GREER and OFFICER W.W. SMITH (BADGE 30),
21 uniformed agents and employees of LUV SECURITY SERVICE, Sacramento,

22 4. Def. LUV SECURITY SERVICE, Sacramento, California, under
23 contract to the defendant FEDERAL PROTECTIVE SERVICE to perform
24 services as contracted. Represented in Sacramento, California
25 by attorney Michael Sands.

26 5. Defs. FEDERAL BUREAU OF INVESTIGATION and DIRECTOR L.
27 PATRICK GRAY, headquartered in Washington, D.C., with local ad-
28 dress of 2800 Cottage Way, Sacramento, California.

29 6. Def. "VICTOR MARTINEZ".

30 7. Other defendants not known to plaintiff.

31 Ronald Reagan-2921

32

ORIGINAL

VI -B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV to the Constitution of the United States.

VI -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, herein-after and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

Ronald Reagan-2922

VII-A

On August 22, 1975, in the United States Post Office, 301 I Street, Sacramento, California, plaintiff filed charges of unlawful, wrongful, malicious and willful harassment and assault of plaintiff in the Post Office by defendant "VICTOR VERNIER" with defendant FEDERAL PROTECTIVE SERVICE officers on duty, defendant OFFICERS CHASTAINE AND CLEMONS.. When plaintiff returned to the Post Office with documents as requested by defendants FPS OFFICERS, plaintiff was suddenly, negligently, and without warning, cause or provocation, attacked, beaten, handcuffed, strangled, and restrained by defendant FPS OFFICERS CHASTAINE, CLEMONS, SMITH, AND GREER.

VII-B

Plaintiff's injuries in the Post Office were the result of the negligence of the defendant, its agents and employees, causing serious, severe and permanent injuries to plaintiff, the nature and extent of which shall be proved at trial.

VII-C

At the time of the wrongful, unlawful, willful, malicious, conspiratorial, unprovoked attack on plaintiff, defendant FPS OFFICERS were under the sole and exclusive management and control of the defendant, its agents and servants, and plaintiff is without knowledge as to the precise negligent acts or omissions to acts causing plaintiff's injuries.

VII-D

The malicious and wanton attack on plaintiff were acts of gross negligence or willful or wanton misconduct, and were caused solely and exclusively by reason of the negligence of the defendant herein, its agents, servants, or employees and was due in no manner whatsoever to any act or failure to act on the part of the plaintiff herein.

Ronald Reagan-2923

ORIGINAL

VII-E

1
2 That on August 22, 1975, in the County of Sacramento, United
3 States Post Office, 301 I Street, Sacramento, California, defen-
4 dants, and each of them, under color of authority and pretense of
5 law, and armed with deadly weapons, and each of them, maliciously,
6 negligently,
7 wantonly, willfully, recklessly, wrongfully, unlawfully, and with-
8 out cause or provocation, violently attacked, beat, strangled,
9 handcuffed, illegally search and seized, falsely arrested, false-
10 ly imprisoned, restrained, and struck plaintiff in and about the
11 face, head and other parts of the body, and made other multiple
12 physical abuses and injuries to plaintiff which required plaintiff
13 to go to the hospital for care and treatment.

VIII

13 negligent
14 Such/restraint of plaintiff's liberty was made without arrest
15 without warrant or other legal process and was unlawful, in that
16 no crime had been committed and in that there was no reason or
17 cause for belief that plaintiff had committed any crime.

IX

18
19 In doing all the acts and things aforesaid defendants, and
20 each of them, acted wilfully and maliciously, grossly, wantonly.

X

21 negligently
22 Plaintiff was/restrained of his liberty by being handcuffed
23 and held incommunicado in a room in the United States Post Office
24 for about one hour, after which time plaintiff was released in
25 the custody of defendants FPS OFFICER CHEASTAINE and LUV OFFICER
26 GREER.

Ronald Reagan-2924

XI

27
28 Defendants FPS OFFICER JAMES CHEASTAINE and LUV OFFICER GREER
29 and negligently
30 forcibly/took plaintiff from the United States Post Office and
31 forcibly took plaintiff to his business automobile parked in a
32 private parking lot one block away. Plaintiff was menaced by said
33 defendants, and each of them, for some time at plaintiff's busi-

ORIGINAL

1 ness automobile. Plaintiff was made to fear for his continued
2 negligently used
3 personal safety from/deadly weapons or fists, and fear for the
4 personal safety of innocent by-standers. Plaintiff was not ar-
5 rested.

XII

6 That by reason of said acts plaintiff was/negligently placed in great
7 fear for his life and physical well being, and the lives and physi-
8 cal well being of innocent by-standers, defendants at all times
9 having the present ability to continue to beat, strangle, hand-
10 cuff, restrain, attack, and otherwise carry out their threats to
11 kill plaintiff, acting under color of authority and pretense of
12 law.

XIII

13
14 The acts of defendants, under color of law, and under color
15 of their authority as federal police officers of the UNITED STATES
16 negligently
17 GOVERNMENT, as herein set out,/deprived plaintiff of the privi-
18 leges and immunities guaranteed to plaintiff as a citizen of the
19 United States, by Amendments I, IV, V, VI, VII, and XIV of the Con-
20 stitution of the United States.

XIV

21 That defendants, and each of the, and with others, knowingly
22 negligently,
23 and willfully/and maliciously organized and caused to be organized
24 conspiracy and agreement among themselves, to suppress and wrong-
25 fully withhold from law enforcement plaintiff's new lifesaving
26 firearms and related technologies by illegally assaulting, attack-
27 ing, beating, and attempting to murder plaintiff under color of
28 authority and pretense of law. Ronald Reagan-2925

XV.

29 That defendants, and each of the, did the/negligent acts and things
30 herein alleged pursuant to, and infurtherance of, the conspiracy
31 and agreement herein set forth, and hereinafter and hereinbefore
32 complained of as incorporated in all causes of action herein. The

ORIGINAL

foregoing wrongful conspiracies and acts done by defendants, and each of them, meant that defendant(s) were not immune from prosecution (28 USC §2680(h)) because defendant(s) were operating within scope of employment and did not use due care toward plaintiff as provided in 28 USC §2680(a) and plaintiff was injured.

XVI

negligent,
By reason of the wrongful, /intentional, willful, and malicious acts of defendants, and each of them, and the wounds and fright thereby caused plaintiff, plaintiff has suffered extreme and severe mental anguish and physical pain, and has been injured in mind and body and earning capacity, and for these reasons of negligence malice, /oppression, and ill will, and humiliation of plaintiff, plaintiff is entitled to and asks for punitive or exemplary damages which shall be proved at trial, and as incorporated herein under DAMAGES on page

XVII

negligent

Prior to said wrongful /and unlawful beating of plaintiff and restraint of plaintiff's liberty, plaintiff had enjoyed a good reputation in and about the City of Sacramento, particularly for honesty and good conduct.

XVIII

That by reason of the injuries inflicted by defendants, and each of them, plaintiff was compelled to and did expend sums for medical care and the employment of physicians and surgeons; by virtue of which plaintiff has incurred debts in amounts to be proved at trial, which sums were necessary, reasonable and proper.

XIX

negligently

That by reason of the injuries /inflicted upon plaintiff by defendants, and each of them, plaintiff will continue to suffer great pain and anguish of body and mind, and permanent disfigurement, the sum of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XX

WHEREFORE, plaintiff demands judgment against defendants,
and each of them, the sum and costs of which shall be proved at
trial, and for compensatory and punitive damages, and for such
other relief as is deemed just and proper by this Court.

Ronald Reagan-2927

SIXTY-FIRST CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 et seq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III -A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

ORIGINAL

of the privileges and immunities guaranteed to plaintiff by Amendments I, IV, V, VI, VII, and XIV to the United States Constitution.

III -B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV to the Constitution of the United States.

III -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, herein-after and hereinbefore complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

Ronald Reagan-2929

1
2
3
4 IV

5 Plaintiff BRONSON is a citizen of the United States, and the
6 amount in controversy exceeds Ten Thousand Dollars, and the UNITED
7 STATES is a party.

8 V

9 Plaintiff does not know the true names and capacities of de-
10 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
11 therefore sues these defendants, and each of them, by such ficti-
12 tious names for damages caused and proximately caused to plaintiff.

13 VI

14 Each of the acts and conspiracies herein complained of in sub-
15 paragraph IX are incorporated herein, hereinafter, and herein-
16 before, as causing the injuries and damages to plaintiff by the
17 defendant, its agents, employees or servants.

18 VII

19 Each of said acts and conspiracies were done against plain-
20 tiff by defendant, its agents, employees or servants, acting under
21 the sole and exclusive management and control of defendant, and
22 in the course of their employment with defendant, its agents,
23 employees and servants.

24 VIII

25 Each of said acts and conspiracies and things done were ma-
26 liciously, willfully, wantonly, intentionally and negligently
27 done against plaintiff by defendant, its agents, employees and
28 servants, under the color of authority and pretense of law, with-
29 out cause or provocation, in negligent acts or omissions to acts
30 causing plaintiff's injuries.

31 Ronald Reagan-2930

Ronald Reagan-2931

IX

The negligence and pattern of acts and conspiracies of defendant UNITED STATES GOVERNMENT, its agents, employees, and servants, have caused plaintiff serious, severe, and permanent injuries:

1. That on August 22, 1975, defendant agents, employees, and servants, FEDERAL PROTECTIVE SERVICE and OFFICERS CHASTAINE and CLEMONS, LUV SECURITY SERVICE and OFFICERS SMITH AND GREER, attacked, beat, restrained, imprisoned, handcuffed, strangled plaintiff in the Post Office.

2. That on April 15/24, 1974, May 3 and 4, 1974, November 5, 1975, June 4, 1977, February 25, 1978, defendant agents, employees, and servants sabotaged plaintiff's business equipment in order to maim or kill plaintiff.

3. That on August 26, 1973, defendant agents, employees, and servants, FEDERAL BUREAU OF INVESTIGATION, DIRECTOR CLARENCE M. KELLEY, in conspiracy with defendant AMERICAN TELEPHONE AND TELEGRAPH (ATT) AND PACIFIC TELEPHONE AND TELEGRAPH (PTT), agents, employees and servants, caused illegal wiretap to be placed on plaintiff's business telephone and threatened to maim or attempt to kill plaintiff when plaintiff demanded illegal wiretap be removed.

4. On 1973: 2/9,13;3/12-15;7/13;8/30,31;9/4,24;11/20; 1974: 1/10,16;2/7,28;5/8,14;11/14,8;12/6,7; 1975: 1/15;2/4,5,8,9,11; 4/21,22;7/8;9/9; 1976: 1/19, for examples, defendants FBI and ATT caused plaintiff's business telephone to "ring" incessantly.

5. On September 30, 1972, defendant agents, employees, and servants, FBI, DIRECTOR L. PATRICK GRAY, trespassed assaulted, and restrained plaintiff in private business building.

6. On October 4, 1972, defendants agents, employees, and servants, FBI and DIRECTOR L. PATRICK GRAY, assaulted and restrained plaintiff in the Post Office, and City Hall.

Ronald Reagan-2932

1 7. On October 4, 1972, defendants, agents, employees and ser-
2 vants, FBI, DIRECTOR GRAY, SP.AIC JOHN REED, violently trespassed,
3 assaulted, threatened, and restrained plaintiff in private busi-
4 ness property.

5 8. On August 27, 1976, defendant, agents, employees and ser-
6 vant, FBI, DIRECTOR CLARENCE KELLEY, in conspiracy with defendant
7 SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD), agent, employee or
8 servant who threatened to beat plaintiff.

9 9. On August 27, 1976 defendants, agents, employees and ser-
10 vants, FBI, DIRECTOR KELLEY and SMUD, violently assaulted and
11 threatened plaintiff in furtherance of the conspiracy against
12 plaintiff; retaliation for filing this lawsuit.

13 10. On May 22, 1973, defendants, agents, employees and ser-
14 vants, FBI and DIRECTOR RUCKELSHAUS, published a false, preju-
15 dicial and libelous letter concerning plaintiff and plaintiff's
16 business.

17 11. On or about 1971 to present, defendants, agents, employ-
18 ees and servants, UNITED STATES ARMY, in conspiracy with WINCHES-
19 TER ARMS/OLIN CORPORATION, REMINGTON ARMS/DUPONT CORP., NATIONAL
20 RIFLE ASSOCIATION, caused to be published verbal and written false
21 statements concerning the ARMY's analysis of plaintiff's United
22 States Patent No. 3,543,528, "Rifle Forestock", and related tech-
23 nologies.

24 12. On or about August 21, 1972, defendants, agents, employ-
25 ees and servants, U.S. ATTORNEY GENERAL RICHARD G. KLEINDIENST,
26 FBI, FBI DIRECTOR GRAY, SECRET SERVICE, IACP, and others, conspir-
27 ed and maliciously suppressed plaintiff's demands for Congression-
28 al Inquiry into said defendants criminal behavior, and each of
29 them, through California United States Senator Alan Cranston.

30 13. On or about October 4, 1972, defendants agents, employ-
31 ees and servants, AG KLEINDIENST, FBI DIRECTOR GRAY, FBI, SECRET
32 SERVICE, and others, conspired and maliciously suppressed plain-

Ronald Reagan-2933

1 tiff's demands for investigation of said defendants criminal be-
2 havior, and each of them, through H.R. HALDEMAN.

3 14. In 1972, defendants, agents, employees and servants, U.S.
4 A.G. KLEINDIENST, FBI DIRECTOR GRAY, FBI, SECRET SERVICE, and
5 others, conspired and maliciously suppressed plaintiff's demands
6 for Congressional Inquiry into said defendants criminal behavior,
7 and each of them, through the United States Senate Judiciary Com-
8 mittee.

9 15. On or about January 18, 1973, defendants, agents, employ-
10 ees and servants, U.S.A.G. KLEINDIENST, FBI DIRECTOR GRAY, FBI,
11 SECRET SERVICE, and others, conspired and maliciously suppressed
12 plaintiff's demands for Congressional Inquiry into said defendants
13 criminal behavior, and each of them, through United States Senate
14 Judiciary Committee Chairman James O. Eastland.

15 16. On or about April 13, 1973, defendants, agents, employ-
16 ees and servants, U.S.A.G. KLEINDIENST, FBI DIRECTOR GRAY, FBI,
17 SECRET SERVICE, and others, conspired and maliciously suppressed
18 plaintiff's demands for Department of Justice inquiry into said
19 defendants criminal acts, and each of them, through United States
20 Attorney General RICHARD G. KLEINDIENST.

21 17. On or about April 13, 1973, defendants, agents, employ-
22 ees and servants, U.S.A.G. KLEINDIENST, FBI DIRECTOR GRAY, FBI,
23 SECRET SERVICE, and others, conspired and maliciously suppressed
24 plaintiff's demands for Congressional Inquiry into said defendants
25 criminal acts, and each of them, through the United States Senate
26 Judiciary Committee.

27 18. On April 28, 1973, defendants, agents, employees and ser-
28 vants, USAG KLEINDIENST, FBI DIRECTOR RUCKELSHAUS, FBI, SECRET
29 SERVICE, and others, conspired and maliciously suppressed plain-
30 tiff's demands for Executive Inquiry into said defendants criminal
31 acts, and each of them, through the Office of the President.

32 19. On or about May 1, 1973, defendants agents, employees

Ronald Reagan-2934

1 and servants, UNITED STATES ATTORNEY GENERAL, FBI AND DIRECTOR,
2 SECRET SERVICE, and others, conspired and maliciously suppressed
3 plaintiff's demands for Executive Inquiry into said defendants
4 criminal acts, and each of them, through the Office of the Presi-
5 dent, President RICHARD M. NIXON.

6 20. On or about March 1, 1974, defendants, agents, employees
7 and servants, U.S. ATTORNEY GENERAL, FBI AND DIRECTOR KELLEY,
8 SECRET SERVICE, and others, conspired and maliciously suppressed
9 plaintiff's demands for Judicial Inquiry into said defendants
10 criminal acts, and each of them, through the United States Chief
11 Justice Warren E. Burger.

12 21. On or about April 17, 1974, defendants, agents, employees
13 and servants, U.S. ATTORNEY GENERAL, FBI AND DIRECTOR KELLEY,
14 SECRET SERVICE, and others, conspired and maliciously suppressed
15 plaintiff's demands for Executive Inquiry into said defendants
16 criminal acts, and each of them, through the Office of the Vice
17 President, plaintiff protested attempted murder and sabotage.

18 22. On or about May 15, 1974, defendants, agents, employees
19 and servants, U.S. ATTORNEY GENERAL, FBI AND DIRECTOR KELLEY,
20 SECRET SERVICE, and others, conspired and maliciously suppressed
21 plaintiff's continued demands for Executive Inquiry into said de-
22 fendants criminal acts, and each of them, through the Office of
23 the Vice President, in acknowledgement of the Vice President,
24 GERALD R. FORD, personal letter to plaintiff of May 1, 1974.

25 23. On or about August 30, 1974, defendants, agents, employ-
26 ees and servants, U.S. ATTORNEY GENERAL, FBI AND DIRECTOR KELLEY,
27 SECRET SERVICE, and others, and Watergate Special Prosecutor LEON
28 JAWORSKI, conspired and maliciously suppressed plaintiff's filing
29 of Principal Formal Legal Charges against RICHARD M. NIXON, U.S.
30 ATTORNEY GENERAL WILLIAM B. SAXBE, and others, for failure to in-
31 vestigate defendants, and each of them, criminal acts which inclu-
32 ded - "criminal conspiracy; malfeasance in office; official miscon-

1 duct; dereliction of duty; criminal negligence; attempted murder;
2 illegal wiretaps; threats of mayhem and assault and battery; des-
3 truction of personal property; harassment and abuse; and illegal
4 use of police power...", the result of which was President GERALD
5 R. FORD's Pardon of RICHARD M. NIXON immediately, through JAWORSKI.

6 24. On or about September 8, 1974, defendants, agents, employ-
7 ees and servants, U.S. ATTORNEY GENERAL SAXBE, FBI AND FBI DIREC-
8 TOR KELLEY, SECRET SERVICE, LEON JAWORSKI, Watergate Special Pro-
9 secutor, and others, conspired and maliciously suppressed plain-
10 tiff's demand for Special Prosecutor inquiry into the Pardon of
11 RICHARD M. NIXON and defendants criminal acts, and each of them,
12 through the Watergate Special Prosecutor LEON JAWORSKI.

13 25. On or about October 9, 1974, defendants, agents, employ-
14 ees and servants, U.S. ATTORNEY GENERAL SAXBE, FBI AND FBI DIREC-
15 TOR KELLEY, SECRET SERVICE, and others, conspired and maliciously
16 suppressed plaintiff's demand for Judicial and Congressional In-
17 quiry into the illegal Pardon of RICHARD M. NIXON which deprived
18 plaintiff of his rights to Equal Protection and Due Process of
19 Law Clauses of the Fourteenth Amendment to the Constitution of
20 the United States, through the Offices of United States Chief
21 Justice Warren E. Burger and United States House of Representatives
22 Judiciary Committee Chairman William Hungate.

23 26. On or about August 23, 1973, defendant, its agents, em-
24 ployees or servants, FBI and FBI DIRECTOR CLARENCE M. KELLEY,
25 illegally wiretapped and illegally disrupted and discontinued
26 plaintiff's lawful business telephone conversation by the use of
27 man identifying himself as "FBI Agent".

28 27. Following August 22, 1975 beating, strangulation, hand-
29 cuffing, false imprisonment, restraining, etc., of plaintiff by def.
30 FPS, its agents, employees or servants, ASST. U.S. ATTORNEY DONALD
31 HELLER refused to accept plaintiff's complaint for criminal acts
32 in plaintiff's capacity of "complaining witness" for the United

1 States.

2 28. From 1972 forward, def. LAW ENFORCEMENT ASSISTANCE
3 ADMINISTRATION, NIXON ADMINISTRATION OFFICIALS, STATE OF CALI-
4 FORNIA, CITY AND COUNTY OF LOS ANGELES, CITY AND COUNTY OF SACRA-
5 MENTO, and others, connived, conspired and collaborated in polit-
6 ical federal funding blackmail to suppress plaintiff's technolo-
7 gies and earn (illegal) campaign contributions or support.

8 29. On or about April 28, 1973, NIXON ADMINISTRATION OFFI-
9 CIALS, FBI, SECRET SERVICE, and WESTERN UNION, their employees,
10 agents or servants, destroyed telegraphic message of plaintiff's.

11 30. On or about October 20, 1972, def. UNITED STATES ASST.
12 ATTORNEY GENERAL HENRY E. PETERSEN, U.S. DEPARTMENT OF JUSTICE,
13 FBI, libeled and slandered plaintiff in publishing of letter con-
14 cerning plaintiff with false and prejudicial statements.

15 The foregoing wrongful conspiracies and acts done by defen-
16 dants, and each of them, meant that defendants, and each of them,
17 were not immune from prosecution (28 USC §2680(h)) because defen-
18 dants, and each of them, were operating within scope of employment
19 and did not use due care toward plaintiff as provided in 28 USC
20 §2680(a) and plaintiff was injured.

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Ronald Reagan-2936

1 X

2 Defendant(s) negligently and intentionally conducted them-
3 selves with such a knowing lack of care for the rights of plain-
4 tiff and others that defendant(s) were directly and proximately
5 responsible for the campaign conducted against plaintiff of fear,
6 intimidation, alarm, menace, duress, emotional distress, appre-
7 hension, invasion of privacy, wiretapping, trespass, libel, slan-
8 der, assault, battery, false imprisonment, restraint, illegal
9 search and seizure, and other violations of Civil Rights, and the
10 practice of fraud and deceit upon plaintiff, and all other unlaw-
11 ful acts under color of authority and pretense of law herein
12 complained of.

Ronald Reagan-2937

13 XI

14 Defendant(s) breach of duty and conduct in office has been
15 so negligent and intentionally illegal so as to create an atmos-
16 phere permitting other law enforcement officials, agents, employ-
17 ees and servants, federal, state, county, and city, to do all il-
18 legal acts and things herein complained of, and hereinafter and
19 hereinbefore complained of, against plaintiff without appropriate
20 authorities stopping the illegal acts.

21 XII

22 To Plaintiff's knowledge, information and belief, defen-
23 dant(s), their agents, employees or servants, conspiratorially
24 refused to investigate crimes brought to the attention of appro-
25 priate defendant(s) by plaintiff. Defendant(s) instead chose to
26 maintain this pattern and campaign against plaintiff of assault,
27 battery, trespass, fear, intimidation, duress, alarm, emotional
28 distress, invasion of privacy, trespass, libel, slander, violation
29 of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping
30 and search and seizure, and other acts herein complained of, in
31 gross negligence or willful or wanton disregard to the sworn
32 duties of each of them, under color of authority and pretense of

law. Plaintiff was prevented and deprived from doing business
1 with defendants, and each of them.

2 XIII

3 Defendants, and each of them, owed plaintiff and others a
4 duty to not intentionally, willfully and negligently inflict bodi-
5 ly harm or loss of property upon them, and owed plaintiff and
6 others their sworn duty to protect plaintiff and others from bodi-
7 ly harm and property damage, and defendants, and each of them,
8 intentionally and intentionally and negligently conspired to not
9 perform that duty.

10 XIV

11 Defendant(s), its agents, employees and servants, and each
12 of them, in doing the conspiracies and acts herein complained of,
13 negligently, wantonly and willfully and maliciously violated their
14 sworn oaths of office to uphold and defend the Constitution of
15 the United States and the Constitution of the State of California
16 to protect citizens (Cal.Const.Art.XX), under color of authority
17 and pretense of law.

18 XV

19 By reason of the wrongful, intentional, and malicious acts,
20 conspiracies and humiliations of plaintiff by defendants, and
21 each of them, and with others, the fright thereby caused plain-
22 tiff to suffer extreme and severe mental anguish and physical
23 pain, and injury in mind and body and earning capacity, the
24 nature and extent of which shall be proved at trial, and as
25 incorporated herein under DAMAGES from page 274.

26 XVI

27 WHEREFORE, plaintiff demands judgment against defendants,
28 and each of them, the nature, extent, sum and costs of which
29 shall be proved at trial, and for compensatory and punitive
30 damages, and for such other relief as is deemed just and proper
31 by this Court.

32 Ronald Reagan-2938

SIXTY-SECOND CAUSE OF ACTION

I

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in Paragraph I through VI, JURRISDICTION (page 2); Title 23, United States Code, Secs. 1343, 1346(b); Title 42, United States Code, Secs. 1981 et seq.; Amendments I, IV, V, VI, VII and XIV to the United States Constitution.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein complained of for deprivations of privileges and immunities under color of authroity and pretense of law.

III

Plaintiff is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, exclusive of interests and costs.

IV

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

Defendants are:

1. Def. STATE OF CALIFORNIA, STATE CONTROLLER HOUSTON I. FLOURNOY, State Capitol, Sacramento, California.
2. Def. STATE OF CALIFORNIA, CALIFORNIA STATE POLICE, CHIEF GUY R. OATES, STATEPOLICE OFFICERS L.D. SHERWOOD, S.W. WESTON.
3. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER, 555 Capitol Mall, Sacramento, California.
4. Def. STATE OF CALIFORNIA, OFFICE OF GOVERNOR, GOVERNOR EDMUND G. BROWN, Jr., MARC POCHE.
5. Def. STATE OF CALIFORNIA, GOVERNOR RONALD REAGAN (Former).

Ronald Reagan-2940

VI

The negligence and pattern of acts and conspiracies of defendant STATE OF CALIFORNIA, its agents, employees, and servants, have caused plaintiff serious, severe, and permanent injuries:

1. That in 1972 defendant agents and employees, ATTORNEY GENERAL EVELLE J. YOUNGER and J.C. HARRIS, threatened plaintiff with bodily harm and refused to investigate crimes occurring in California against plaintiff, in addition to the People of the State of California.

2. That on August 17, 1972, defendant agents and employees, ATTORNEY GENERAL YOUNGER and ANDREW TICKVITZA, maliciously interfered with plaintiff's business activities and attempted to discredit and downgrade plaintiff in the mind of business associate.

3. That on April 15/24, 1974, May 3, 1974, May 4, 1974, November 5, 1976, June 4, 1977, February 25, 1978, defendant agents, employees and servants sabotaged plaintiff's business equipment in order to maim or kill plaintiff.

4. That on January 23, 1974, defendant agents, employees, and servants, STATE CONTROLLER HOUSTON I. FLOURNOY and STATE POLICE, trespassed, assaulted, and restrained plaintiff to private business property.

5. That on January 23, 1976, defendant agent, employees, and servants, CALIFORNIA HIGHWAY PATROL, attacked and battered plaintiff with a pursuit plane.

6. That on February 3, 1976, defendant agents, employees, and servants, CALIFORNIA HIGHWAY PATROL, tracked and stalked plaintiff all over the CITY OF SACRAMENTO.

7. That on February 8, 1974, defendant agents, employees, and servants, CALIFORNIA STATE POLICE and CHIEF GUY R. CATES, assaulted and restrained plaintiff in the State Capitol.

8. That on September 29, 1972, defendant agents, employees, and servants, ATTORNEY GENERAL YOUNGER and STATE POLICE, assault-

Ronald Reagan-2941

1 ed and restrained plaintiff in the United States Post Office.

2 9. That on September 21 and 27, 1973, defendant agents,
3 employees, and servants, CALIFORNIA STATE POLICE and CHIEF CATES,
4 stalked and tracked plaintiff away from state property.

5 10. That in July 1976, defendant agents, employees, and
6 servants, GOVERNOR EDMUND G. BROWN, Jr., and MARC POCHE, threaten-
7 ed plaintiff's personal safety if plaintiff did not stop trying
8 to file charges of criminal acts in California.

9 11. That on February 11, 1977, defendant agents, employees,
10 and servants, GOVERNOR BROWN, CALIFORNIA STATE POLICE, OFFICERS
11 OATES, SHERWOOD AND WESTON, retaliated against plaintiff for fil-
12 ing this complaint, and in political motivation, assaulted and
13 restrained plaintiff in administrative hearing.

14 12. That on January 23, 1975, defendant agents, employees,
15 and servants, ATTORNEY GENERAL YOUNGER and D.A.G. "ALEXANDER",
16 refused to permit plaintiff to file charges of criminal activity
17 in California, and in furtherance of the harassment of plaintiff,
18 gave the fictitious name of "ALEXANDER".

19 13. That on January 23, 1976, defendant, its agents, employ-
20 ees and servants, ATTORNEY GENERAL YOUNGER and GOVERNOR EDMUND G.
21 BROWN, and others, refused to investigate CALIFORNIA HIGHWAY PA-
22 TROL attack of plaintiff by use of pursuit plane, and refused to
23 accept plaintiff's filing of criminal charges as related to the
24 malicious and negligent acts.

25 14. That on March 23, 1973, defendant, its agents, employ-
26 ees and servants, ATTORNEY GENERAL YOUNGER AND GOVERNOR RONALD
27 REAGAN, and others, refused to investigate and accept plaintiff's
28 filing of criminal charges for crimes committed in California.

29 15. That on or about February 5, 1974, defendant, its agents,
30 employees and servants, ATTORNEY GENERAL YOUNGER and STATE CON-
31 TROLLER HOUSTON I. FLOURNOY, and others, refused to investigate
32 CALIFORNIA HIGHWAY PATROL conspiracy with STATE CONTROLLER FLOUR-

1 NOY, and accept plaintiff's filing of criminal charges for crimes
2 committed in California.

3 16. On August 27, 1976, defendant, its agents, employees,
4 or servants, ATTORNEY GENERAL YOUNGER, FBI, DIRECTOR KELLEY and
5 SMUD, violently assaulted and threatened plaintiff in furtherance
6 of the conspiracy against plaintiff.

7 17. That on or about February 2, 1975, defendant, its agents,
8 employees or servants, ATTORNEY GENERAL YOUNGER and GOVERNOR E.G.
9 BROWN, refused to investigate and correct crimes and charges filed
10 by plaintiff.

11 18. That on or about May 5, 1975, defendant, its agents, em-
12 ployees or servants, ATTORNEY GENERAL YOUNGER and GOVERNOR EDMUND
13 G. BROWN, refused to investigate and correct crimes and charges
14 filed by plaintiff.

15 19. That from 1972 forward, def. LAW ENFORCEMENT ASSISTANCE
16 ADMINISTRATION, NIXON ADMINISTRATION OFFICIALS, STATE OF CALIFORN-
17 IA, CITY AND COUNTY OF LOS ANGELES, CITY AND COUNTY OF SACRAMENTO,
18 and others, connived, conspired and collaborated in political
19 federal funding blackmail to suppress plaintiff's technologies
20 and earn (illegal) campaign contributions or support.

21 20. On August 27, 1976, defendant, its agents, employees or
22 servants, FBI, DIRECTOR KELLEY, STATE OF CALIFORNIA, and SMUD, its
23 agent, employee or servant, violently assaulted and threatened
24 plaintiff in furtherance of the conspiracy to suppress plsintiff
25 and in retaliation for filing this lawsuit.

26 21. That from 1972 forward, defendant, its agents, employ-
27 ees or servants, ATTORNEY GENERAL YOUNGER, GOVERNOR BROWN, and
28 others, have acted in wrongful and malicious conspiracy in cor-
29 rupt practices concerning campaign activities and covering up
30 said activities by wrongfully suppressing plaintiff's technolo-
31 gies in exchange for election campaign support.

32 Ronald Reagan-2942

1 The foregoing wrongful conspiracies and acts done by defen-
2 dants, and each of them, meant that defendants, and each of them,
3 were not immune from prosecution (28 USC §2680(b)) because defen-
4 dants, and each of them, were operating within scope of employment
5 and did not use due care toward plaintiff as provided in 28 USC
6 §2680(a) and plaintiff was injured.

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X

Defendant(s) negligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defendant(s) were directly and proximately responsible for the campaign conducted against plaintiff of fear, intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, trespass, libel, slander, assault, battery, false imprisonment, restraint, illegal search and seizure, and other violations of Civil Rights, and the practice of fraud and deceit upon plaintiff, and all other unlawful acts under color of authority and pretense of law herein complained of.

XI

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal so as to create an atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

XII

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping and search and seizure, and other acts herein complained of, in gross negligence or willful or wanton disregard to the sworn duties of each of them, under color of authority and pretense of

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XIII

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2945

SIXTY-THIRD CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

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1 of the privileges and immunities guaranteed to plaintiff by
2 Amendments I, IV, V, VI, VII, and XIV of the United States
3 Constitution.

4 III -B

5 Plaintiff does hereby incorporate and adopt by reference,
6 all allegations set forth in JURISDICTION (page 2); Title 28 of
7 the United States Code, Sections 1343 and 1346(b); Title 42 of
8 the United States Code, Section 1981 et seq.; Amendments I, IV,
9 V, VI, VII, and XIV of the Constitution of the United States.

10 III -C

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action herein, here-
13 inafter and hereinbefore complained of, for deprivations of
14 privileges and immunities under color of authority and pretense
15 of law and negligence.

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IV

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Each of the acts and conspiracies herein complained of in subparagraph IX are incorporated herein, hereinafter, and hereinbefore, as causing the injuries and damages to plaintiff by the defendant, its agents, employees or servants.

VII

Each of said acts and conspiracies were done against plaintiff by defendant, its agents, employees or servants, acting under the sole and exclusive management and control of defendant, and in the course of their employment with defendant, its agents, employees and servants.

VIII

Each of said acts and conspiracies and things done were maliciously, willfully, wantonly, intentionally and negligently done against plaintiff by defendant, its agents, employees and servants, under the color of authority and pretense of law, without cause or provocation, in negligent acts or omissions to acts causing plaintiff's injuries.

Ronald Reagan-2948

IX

The negligence and pattern of acts and conspiracies of defendant COUNTY OF SACRAMENTO, its agents, employees, and servants, have caused plaintiff serious, severe, and permanent injuries:

1. That in February 1974, defendant, its agents, employees or servants, SACRAMENTO COUNTY SHERIFF'S DEPARTMENT, refused to investigate or lift the law enforcement conspiracy imposed wrongfully on plaintiff.

2. That on or about May 1, 1975, defendant, its agents, employees or servants, SACRAMENTO COUNTY SHERIFF'S DEPARTMENT and SHERIFF DUANE LOWE and INSPECTOR ROBERT BLYTHE, refused to investigate plaintiff's filing of criminal charges with SACRAMENTO SHERIFF'S INSPECTOR BLYTHE; choosing instead to act as though SHERIFF'S INSPECTOR ROBERT BLYTHE never was employed by the SACRAMENTO SHERIFFS DEPARTMENT; choosing instead to negligently and wrongfully fail to act as the top law enforcement agency in the COUNTY OF SACRAMENTO, the CITY OF SACRAMENTO POLICE DEPARTMENT having negligently and wantonly failed in its duties of law enforcement in SACRAMENTO.

3. That on or about April 29, 1976, defendant, its agents, employees or servants, DISTRICT ATTORNEY JOHN PRICE, and others refused to investigate crimes committed in SACRAMENTO COUNTY by officials of SACRAMENTO COUNTY.

4. That on or about August 22, 1975, defendant, its agents, employees or servants, SACRAMENTO SHERIFFS DEPARTMENT and SHERIFF DUANE LOWE, refused to investigate the attack, beating, false arrest, false imprisonment, strangulation and handcuffing of plaintiff in the Post Office.

5. From 1972 forward, defs. LEAA, NIXON ADMINISTRATION, CITY AND COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, CITY AND COUNTY OF SACRAMENTO, and others, connived, conspired, collaborated in political and federal funding blackmail to suppress plaintiff's

1 technologies and earn (illegal) campaign contributions and
2 support.

3 The foregoing wrongful conspiracies and acts done by defen-
4 dants, and each of them, meant that defendants, and each of them,
5 were not immune from prosecution (28 USC §2680(h)) because defen-
6 dants, and each of them, were operating within scope of employ-
7 ment and did not use due care toward plaintiff as provided in
8 28 USC §2680(a) and plaintiff was injured.

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2 Defendant(s) negligently and intentionally conducted them-
3 selves with such a knowing lack of care for the rights of plain-
4 tiff and others that defendant(s) were directly and proximately
5 responsible for the campaign conducted against plaintiff of fear,
6 intimidation, alarm, menace, duress, emotional distress, appre-
7 hension, invasion of privacy, wiretapping, trespass, libel, slan-
8 der, assault, battery, false imprisonment, restraint, illegal
9 search and seizure, and other violations of Civil Rights, and the
10 practice of fraud and deceit upon plaintiff, and all other unlaw-
11 ful acts under color of authority and pretense of law herein
12 complained of.

XI

13
14 Defendant(s) breach of duty and conduct in office has been
15 so negligent and intentionally illegal so as to create an atmos-
16 phere permitting other law enforcement officials, agents, employ-
17 ees and servants, federal, state, county, and city, to do all il-
18 legal acts and things herein complained of, and hereinafter and
19 hereinbefore complained of, against plaintiff without appropriate
20 authorities stopping the illegal acts.

XII

21
22 To Plaintiff's knowledge, information and belief, defen-
23 dant(s), their agents, employees or servants, conspiratorially
24 refused to investigate crimes brought to the attention of appro-
25 priate defendant(s) by plaintiff. Defendant(s) instead chose to
26 maintain this pattern and campaign against plaintiff of assault,
27 battery, trespass, fear, intimidation, duress, alarm, emotional
28 distress, invasion of privacy, trespass, libel, slander, violation
29 of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping
30 and search and seizure, and other acts herein complained of, in
31 gross negligence or willful or wanton disregard to the sworn
32 duties of each of them, under color of authority and pretense of

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XIII

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2952

SIXTY-FOURTH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

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II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III-A

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff of the privileges and immunities guaranteed to plaintiff by Amend-

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ments I, IV, V, VI, VII, and XIV, of the United States Constitution.

III -B

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in JURISDICTION (page 2); Title 28 of the United States Code, Sections 1343 and 1346(b); Title 42 of the United States Code, Section 1981 et seq.; Amendments I, IV, V, VI, VII, and XIV to the Constitution of the United States.

III -C

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth in all causes of action herein, hereinafter and hereinafters complained of, for deprivations of privileges and immunities under color of authority and pretense of law.

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IV

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Each of the acts and conspiracies herein complained of in subparagraph IX are incorporated herein, hereinafter, and hereinbefore, as causing the injuries and damages to plaintiff by the defendant, its agents, employees or servants.

VII

Each of said acts and conspiracies were done against plaintiff by defendant, its agents, employees or servants, acting under the sole and exclusive management and control of defendant, and in the course of their employment with defendant, its agents, employees and servants.

VIII

Each of said acts and conspiracies and things done were maliciously, willfully, wantonly, intentionally and negligently done against plaintiff by defendant, its agents, employees and servants, under the color of authority and pretense of law, without cause or provocation, in negligent acts or omissions to acts causing plaintiff's injuries.

Ronald Reagan-2955

Ronald Reagan-2956

IX

The negligence and pattern of acts and conspiracies of defendant CITY OF SACRAMENTO, its agents, employees, and servants, have caused plaintiff serious, severe, and permanent injuries:

1. That throughout the summer of 1973, and especially January 23, 1974 and May 8, 1974, defendant agents, employees or servants, uniformed police officers in decaled vehicles of the CITY OF SACRAMENTO and SACRAMENTO POLICE DEPARTMENT, wrongfully tracked and followed plaintiff throughout the streets of Sacramento.

2. Incorporating sub-paragraph 1. above, SACRAMENTO POLICE DEPARTMENT OFFICERS followed plaintiff for blocks at a time, and on circuitious routes, in 1975 and 1976, especially May 5, 1975, February 10, 1976, and April 25, 1976.

3. Incorporating sub-paragraphs 1. and 2. above, defendant agent, employee, or servant BADGE 295 followed plaintiff during summer of 1974 and on July 23, 1975.

4. Incorporating sub-paragraphs 1., 2., and 3. above, defendant agent, employee, or servant OFFICER GORSKI (BADGE NO. 341) stalked plaintiff, especially October 3, 1974, all over McKinley Park, and on May 14, 1975.

5. Incorporating sub-paragraphs 1.-4. above, defendant agent, employee or servant, unknown CITY OF SACRAMENTO POLICE OFFICER in decaled vehicle attempted to ram plaintiff's legally parked business vehicle on February 10, 1976.

6. That on July 25, 1972, defendant, its agents, employees or servants, SACRAMENTO CITY POLICE DEPARTMENT and CHIEF WILLIAM J. KINNEY, and others, libeled and slandered plaintiff with false information concerning plaintiff's business.

7. That on August 22, 1975, defendant, its agents, employees and servants, SACRAMENTO CITY POLICE DEPARTMENT and CHIEF WILLIAM J. KINNEY, and others, refused to investigate the attack, beating, false arrest, false imprisonment, strangulation and handcuffing

1 of plaintiff in the Post Office.

2 8. That on March 16, 1976, defendant, its agents, employees
3 or servants, SACRAMENTO CITY POLICE DEPARTMENT and CHIEF OF POLICE
4 WILLIAM J. KINNEY, refused to investigate crimes committed in Sac-
5 ramento and personally filed before KINNEY by plaintiff BRONSON.

6 9. That on September 27, 1973, defendant, its agents, employ-
7 ees or servants, CITY OF SACRAMENTO, POLICE DEPARTMENT and CHIEF
8 KINNEY, uniformed officer assaulted plaintiff with official po-
9 lice vehicle.

10 10. That on October 15, 1974, defendant, its agents, employ-
11 ees or servants, CITY OF SACRAMENTO, POLICE DEPARTMENT and CHIEF
12 KINNEY, uniformed officer assaulted plaintiff with official po-
13 lice vehicle.

14 11. That on May 5, 1975, defendant, its agents, employees or
15 servant, CITY OF SACRAMENTO, OFFICE OF THE MAYOR, refused to in-
16 vestigate and order stopped all conspiracies, assaults and other
17 illegal acts by CITY OF SACRAMENTO agents, employees or servants.

18 12. That on April 30, 1976, defendant, its agents, employ-
19 ees or servants, CITY OF SACRAMENTO, OFFICE OF THE MAYOR, refused
20 to investigate and order stopped all continuing conspiracies,
21 assaults and other illegal acts against plaintiff by def. CITY OF
22 SACRAMENTO agents, employees or servants.

23 13. That from 1972 forward, def. LAW ENFORCEMENT ASSISTANCE
24 ADMINISTRATION, NIXON ADMINISTRATION OFFICIALS, STATE OF CALI-
25 FORNIA, CITY AND COUNTY OF LOS ANGELES, CITY AND COUNTY OF SACRA-
26 MENTO, and others, connived, conspired and collaborated in polit-
27 ical federal funding blackmail to suppress plaintiff's technolo-
28 gies and earn (illegal) campaign contributions.or support.

29 The foregoing wrongful conspiracies and acts done by defen-
30 dants, and each of them, meant that defendant(s) were not immune
31 from prosecution (28USCs2680(b)) because defendant(s) were opera-
32 ting within scope of employment and did not use due care toward

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plaintiff as provided in 28USCS2680(a) and plaintiff was injured.

X

Defendant(s) negligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defendant(s) were directly and proximately responsible for the campaign conducted against plaintiff of fear, intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, trespass, libel, slander, assault, battery, false imprisonment, restraint, illegal search and seizure, and other violations of Civil Rights, and the practice of fraud and deceit upon plaintiff, and all other unlawful acts under color of authority and pretense of law herein complained of.

XI

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal so as to create an atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

XII

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping and search and seizure, and other acts herein complained of, in gross negligence or willful or wanton disregard to the sworn duties of each of them, under color of authority and pretense of

law. Plaintiff was prevented and deprived from doing business
1 with defendants, and each of them.

XIII

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3 Defendants, and each of them, owed plaintiff and others a
4 duty to not intentionally, willfully and negligently inflict bodi-
5 ly harm or loss of property upon them, and owed plaintiff and
6 others their sworn duty to protect plaintiff and others from bodi-
7 ly harm and property damage, and defendants, and each of them,
8 intentionally and intentionally and negligently conspired to not
9 perform that duty.

XIV

10
11 Defendant(s), its agents, employees and servants, and each
12 of them, in doing the conspiracies and acts herein complained of,
13 negligently, wantonly and willfully and maliciously violated their
14 sworn oaths of office to uphold and defend the Constitution of
15 the United States and the Constitution of the State of California
16 to protect citizens (Cal.Const.Art.XX), under color of authority
17 and pretense of law.

XV

18
19 By reason of the wrongful, intentional, and malicious acts,
20 conspiracies and humiliations of plaintiff by defendants, and
21 each of them, and with others, the fright thereby caused plain-
22 tiff to suffer extreme and severe mental anguish and physical
23 pain, and injury in mind and body and earning capacity, the
24 nature and extent of which shall be proved at trial, and as
25 incorporated herein under DAMAGES from page 274.

XVI

26
27 WHEREFORE, plaintiff demands judgment against defendants,
28 and each of them, the nature, extent, sum and costs of which
29 shall be proved at trial, and for compensatory and punitive
30 damages, and for such other relief as is deemed just and proper
31 by this Court.

Ronald Reagan-2959

SIXTY-FIFTH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

ORIGINAL

1 of the privileges and immunities guaranteed to plaintiff by
2 Amendments I, IV, V, VI, VII, and XIV of the United States
3 Constitution.

4 III -B

5 Plaintiff does hereby incorporate and adopt by reference,
6 all allegations set forth in JURISDICTION (page 2); Title 23 of
7 the United States Code, Sections 1343 and 1346(b); Title 42 of
8 the United States Code, Section 1981 et seq.; Amendments I, IV,
9 V, VI, VII, and XIV of the Constitution of the United States.

10 III -C

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action herein, here-
13 inafter and hereinbefore complained of, for deprivations of
14 privileges and immunities under color of authority and pretense
15 of law and negligence.

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30 Ronald Reagan-2961
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3 ORIGINAL

4 IV

5 Plaintiff BRONSON is a citizen of the United States, and the
6 amount in controversy exceeds Ten Thousand Dollars, and the UNITED
7 STATES is a party.

8 V

9 Plaintiff does not know the true names and capacities of de-
10 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
11 therefore sues these defendants, and each of them, by such ficti-
12 tious names for damages caused and proximately caused to plaintiff.

13 VI

14 Each of the acts and conspiracies herein complained of in sub-
15 paragraph IX are incorporated herein, hereinafter, and herein-
16 before, as causing the injuries and damages to plaintiff by the
17 defendant, its agents, employees or servants.

18 VII

19 Each of said acts and conspiracies were done against plain-
20 tiff by defendant, its agents, employees or servants, acting under
21 the sole and exclusive management and control of defendant, and
22 in the course of their employment with defendant, its agents,
23 employees and servants.

24 VIII

25 Each of said acts and conspiracies and things done were ma-
26 liciously, willfully, wantonly, intentionally and negligently
27 done against plaintiff by defendant, its agents, employees and
28 servants, under the color of authority and pretense of law, with-
29 out cause or provocation, in negligent acts or omissions to acts
30 causing plaintiff's injuries.

31 Ronald Reagan-2962

IX

The negligence and pattern of acts and conspiracies of defendants CITY AND COUNTY OF LOS ANGELES, their agents, employees or servants, have caused plaintiff serious, severe, and permanent injuries:

1. That from 1972 forward, def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION, NIXON ADMINISTRATION OFFICIALS, STATE OF CALIFORNIA, CITY AND COUNTY OF LOS ANGELES, CITY AND COUNTY OF SACRAMENTO, and others, connived, conspired and collaborated in political federal funding blackmail to suppress plaintiff's technologies and earn (illegal) campaign contributions or support.

2. That on or about May 15, 1975, def. CITY OF LOS ANGELES, MAYOR THOMAS BRADLEY, refused to investigate conspiracies and federal funding blackmail in LOS ANGELES POLICE DEPARTMENT.

3. That in return for not implementing plaintiff's law enforcement technologies and new lifesaving applications, LOS ANGELES COUNTY, SHERIFFS DEPARTMENT, SHERIFF PETER PITCHESS, was seriously considered by the NIXON ADMINISTRATION for Director of the FBI.

4. That on or about February 4, 1975, defendant COUNTY OF LOS ANGELES, DISTRICT ATTORNEY, refused to investigate plaintiff's filing of criminal conspiracy charges and permitted the conspiracies to continue against plaintiff.

The foregoing wrongful conspiracies and acts done by defendants, and each of them, meant that defendant(s) were not immune from prosecution (28USCs2630(b)) because defendant(s) were operating within scope of employment and did not use due care toward plaintiff as provided in 28 USC §2680(a) and plaintiff was injured.

Ronald Reagan-2963

X

Defendant(s) negligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defendant(s) were directly and proximately responsible for the campaign conducted against plaintiff of fear, intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, trespass, libel, slander, assault, battery, false imprisonment, restraint, illegal search and seizure, and other violations of Civil Rights, and the practice of fraud and deceit upon plaintiff, and all other unlawful acts under color of authority and pretense of law herein complained of.

XI

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal so as to create an atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

XII

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping and search and seizure, and other acts herein complained of, in gross negligence or willful or wanton disregard to the sworn duties of each of them, under color of authority and pretense of

ORIGINAL

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XIII

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2965

SIXTY-SIXTH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

Ronald Reagan-2966

ORIGINAL

1 of the privileges and immunities guaranteed to plaintiff by
2 Amendments I, IV, V, VI, VII, and XIV of the United States
3 Constitution.

4 III -B

5 Plaintiff does hereby incorporate and adopt by reference,
6 all allegations set forth in JURISDICTION (page 2); Title 28 of
7 the United States Code, Sections 1343 and 1346(b); Title 42 of
8 the United States Code, Section 1981 et seq.; Amendments I, IV,
9 V, VI, VII, and XIV of the Constitution of the United States.

10 III -C

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action herein, here-
13 inafter and hereinbefore complained of, for deprivations of
14 privileges and immunities under color of authority and pretense
15 of law and negligence.

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30 Ronald Reagan-2967
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3 ORIGINAL

4 IV

5 Plaintiff BRONSON is a citizen of the United States, and the
6 amount in controversy exceeds Ten Thousand Dollars, and the UNITED
7 STATES is a party.

8 V

9 Plaintiff does not know the true names and capacities of de-
10 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
11 therefore sues these defendants, and each of them, by such ficti-
12 tious names for damages caused and proximately caused to plaintiff.

13 VI

14 Each of the acts and conspiracies herein complained of in sub-
15 paragraph IX are incorporated herein, hereinafter, and herein-
16 before, as causing the injuries and damages to plaintiff by the
17 defendant, its agents, employees or servants.

18 VII

19 Each of said acts and conspiracies were done against plain-
20 tiff by defendant, its agents, employees or servants, acting under
21 the sole and exclusive management and control of defendant, and
22 in the course of their employment with defendant, its agents,
23 employees and servants.

24 VIII

25 Each of said acts and conspiracies and things done were ma-
26 liciously, willfully, wantonly, intentionally and negligently
27 done against plaintiff by defendant, its agents, employees and
28 servants, under the color of authority and pretense of law, with-
29 out cause or provocation, in negligent acts or omissions to acts
30 causing plaintiff's injuries.

31 Ronald Reagan-2968

IX

The negligence and pattern of acts and conspiracies of defendant SACRAMENTO MUNICIPAL UTILITY DISTRICT (SMUD), its agents, employees or servants, have caused plaintiff serious, severe and permanent injuries:

1. That beginning on or about 1972, defendants connived, conspired and collaborated in political federal funding blackmail to suppress plaintiff's technologies and earn (illegal) campaign contributions or support.

2. That on August 27, 1976, defendant, its agents, employees or servants, FBI, DIRECTOR CLARENCE KELLEY, and others, in conspiracy, violently assaulted and threatened plaintiff in furtherance of the conspiracy against plaintiff in retaliation for filing this lawsuit.

The foregoing wrongful conspiracies and acts done by defendants, and each of them, meant that defendant(s) were not immune from prosecution (28 USC §2680(b)) because defendant(s) were operating within scope of employment and did not use due care toward plaintiff as provided in 28 USC §2680(a) and plaintiff was injured.

Ronald Reagan-2969

X

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2 Defendant(s) negligently and intentionally conducted them-
3 selves with such a knowing lack of care for the rights of plain-
4 tiff and others that defendant(s) were directly and proximately
5 responsible for the campaign conducted against plaintiff of fear,
6 intimidation, alarm, menace, duress, emotional distress, appre-
7 hension, invasion of privacy, wiretapping, trespass, libel, slan-
8 der, assault, battery, false imprisonment, restraint, illegal
9 search and seizure, and other violations of Civil Rights, and the
10 practice of fraud and deceit upon plaintiff, and all other unlaw-
11 ful acts under color of authority and pretense of law herein
12 complained of.

XI

13
14 Defendant(s) breach of duty and conduct in office has been
15 so negligent and intentionally illegal so as to create an atmos-
16 phere permitting other law enforcement officials, agents, employ-
17 ees and servants, federal, state, county, and city, to do all il-
18 legal acts and things herein complained of, and hereinafter and
19 hereinbefore complained of, against plaintiff without appropriate
20 authorities stopping the illegal acts.

XII

21
22 To Plaintiff's knowledge, information and belief, defen-
23 dant(s), their agents, employees or servants, conspiratorially
24 refused to investigate crimes brought to the attention of appro-
25 priate defendant(s) by plaintiff. Defendant(s) instead chose to
26 maintain this pattern and campaign against plaintiff of assault,
27 battery, trespass, fear, intimidation, duress, alarm, emotional
28 distress, invasion of privacy, trespass, libel, slander, violation
29 of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping
30 and search and seizure, and other acts herein complained of, in
31 gross negligence or willful or wanton disregard to the sworn
32 duties of each of them, under color of authority and pretense of

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XIII

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2971

SIXTY-SEVENTH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

ORIGINAL

1 of the privileges and immunities guaranteed to plaintiff by
2 Amendments I, IV, V, VI, VII, and XIV of the United States
3 Constitution.

4 III -B

5 Plaintiff does hereby ;incorporate and adopt by reference,
6 all allegations set forth in JURISDICTION (page 2); Title 23 of
7 the United States Code, Sections 1343 and 1346(b); Title 42 of
8 the United States Code, Section 1981 ;et seq.; Amendments I, IV,
9 V, VI, VII, and XIV of the Constitution of the United States.

10 III -C

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action herein, here-
13 inafter and hereinbefore complained of, for deprivations of
14 privileges and immunities under color of authority and pretense
15 of law and negligence.

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30 Ronald Reagan-2973
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3 ORIGINAL

4 IV

5 Plaintiff BRONSON is a citizen of the United States, and the
6 amount in controversy exceeds Ten Thousand Dollars, and the UNITED
7 STATES is a party.

8 V

9 Plaintiff does not know the true names and capacities of de-
10 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
11 therefore sues these defendants, and each of them, by such ficti-
12 tious names for damages caused and proximately caused to plaintiff.

13 VI

14 Each of the acts and conspiracies herein complained of in sub-
15 paragraph IX are incorporated herein, hereinafter, and herein-
16 before, as causing the injuries and damages to plaintiff by the
17 defendant, its agents, employees or servants.

18 VII

19 Each of said acts and conspiracies were done against plain-
20 tiff by defendant, its agents, employees or servants, acting under
21 the sole and exclusive management and control of defendant, and
22 in the course of their employment with defendant, its agents,
23 employees and servants.

24 VIII

25 Each of said acts and conspiracies and things done were ma-
26 liciously, willfully, wantonly, intentionally and negligently
27 done against plaintiff by defendant, its agents, employees and
28 servants, under the color of authority and pretense of law, with-
29 out cause or provocation, in negligent acts or omissions to acts
30 causing plaintiff's injuries.

31 Ronald Reagan-2974

IX

The negligence and pattern of acts and conspiracies of defendants AMERICAN TELEPHONE AND TELEGRAPH and PACIFIC TELEPHONE COMPANY DIVISION, their agents, employees or servants, have caused plaintiff serious, severe and permanent injuries:

1. That beginning on or about 1972, defendants, their agents, employees or servants, have conspired, connived, and collaborated with defs. FBI, STATE OF CALIFORNIA, and others, and maintained illegal wiretaps (warrantless searches) on plaintiff's business telephone and have illegally monitored, recorded, or other, each business telephone conversation of plaintiff's, removing from plaintiff unrestricted lawful use of business telephone.

2. That on August 26, 1973, defendants, their agents, employees or servants, assaulted plaintiff, threatened mayhem and permanent bodily damage, and refused to remove illegal wiretap.

3. That beginning on or about 1972, defendants, their employees, agents or servants, have conspired, connived, and collaborated with defs. FBI, STATE OF CALIFORNIA, and others, and have deliberately caused plaintiff's business telephone to "ring" incessantly and "malfunction".

4. That from 1972 forward, def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION, NIXON ADMINISTRATION OFFICIALS, STATE OF CALIFORNIA, CITY AND COUNTY OF LOS ANGELES, CITY AND COUNTY OF SACRAMENTO, ATT/PTT, and others, connived, conspired and collaborated in political federal funding blackmail to suppress plaintiff's technologies and earn (illegal) campaign contributions or support.

The foregoing wrongful conspiracies and acts done by defendants, and each of them, meant that defendant(s) were not immune from prosecution (28 USC §2680(b)) because defendant(s) were operating within scope of employment and did not use due care toward plaintiff as provided in 28 USC §2680(a) and plaintiff was injured.

X

1
2 Defendant(s) negligently and intentionally conducted them-
3 selves with such a knowing lack of care for the rights of plain-
4 tiff and others that defendant(s) were directly and proximately
5 responsible for the campaign conducted against plaintiff of fear,
6 intimidation, alarm, menace, duress, emotional distress, appre-
7 hension, invasion of privacy, wiretapping, trespass, libel, slan-
8 der, assault, battery, false imprisonment, restraint, illegal
9 search and seizure, and other violations of Civil Rights, and the
10 practice of fraud and deceit upon plaintiff, and all other unlaw-
11 ful acts under color of authority and pretense of law herein
12 complained of.

XI

13
14 Defendant(s) breach of duty and conduct in office has been
15 so negligent and intentionally illegal so as to create an atmos-
16 phere permitting other law enforcement officials, agents, employ-
17 ees and servants, federal, state, county, and city, to do all il-
18 legal acts and things herein complained of, and hereinafter and
19 hereinbefore complained of, against plaintiff without appropriate
20 authorities stopping the illegal acts.

Ronald Reagan-2976

XII

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22 To Plaintiff's knowledge, information and belief, defen-
23 dant(s), their agents, employees or servants, conspiratorially
24 refused to investigate crimes brought to the attention of appro-
25 priate defendant(s) by plaintiff. Defendant(s) instead chose to
26 maintain this pattern and campaign against plaintiff of assault,
27 battery, trespass, fear, intimidation, duress, alarm, emotional
28 distress, invasion of privacy, trespass, libel, slander, violation
29 of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping
30 and search and seizure, and other acts herein complained of, in
31 gross negligence or willful or wanton disregard to the sworn
32 duties of each of them, under color of authority and pretense of

law. Plaintiff was prevented and deprived from doing business
1 with defendants, and each of them.

XIII

2
3 Defendants, and each of them, owed plaintiff and others a
4 duty to not intentionally, willfully and negligently inflict bodi-
5 ly harm or loss of property upon them, and owed plaintiff and
6 others their sworn duty to protect plaintiff and others from bodi-
7 ly harm and property damage, and defendants, and each of them,
8 intentionally and intentionally and negligently conspired to not
9 perform that duty.

XIV

10
11 Defendant(s), its agents, employees and servants, and each
12 of them, in doing the conspiracies and acts herein complained of,
13 negligently, wantonly and willfully and maliciously violated their
14 sworn oaths of office to uphold and defend the Constitution of
15 the United States and the Constitution of the State of California
16 to protect citizens (Cal.Const.Art.XX), under color of authority
17 and pretense of law.

XV

18
19 By reason of the wrongful, intentional, and malicious acts,
20 conspiracies and humiliations of plaintiff by defendants, and
21 each of them, and with others, the fright thereby caused plain-
22 tiff to suffer extreme and severe mental anguish and physical
23 pain, and injury in mind and body and earning capacity, the
24 nature and extent of which shall be proved at trial, and as
25 incorporated herein under DAMAGES from page 274.

XVI

26
27 WHEREFORE, plaintiff demands judgment against defendants,
28 and each of them, the nature, extent, sum and costs of which
29 shall be proved at trial, and for compensatory and punitive
30 damages, and for such other relief as is deemed just and proper
31 by this Court.

32 Ronald Reagan-2977

SIXTY-EIGHTH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 et seq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

Ronald Reagan-2978

ORIGINAL

1 of the privileges and immunities guaranteed to plaintiff by
2 Amendments I, IV, V, VI, VII, and XIV of the United States
3 Constitution.

4 III -B

5 Plaintiff does hereby incorporate and adopt by reference,
6 all allegations set forth in JURISDICTION (page 2); Title 28 of
7 the United States Code, Sections 1343 and 1346(b); Title 42 of
8 the United States Code, Section 1981 et seq.; Amendments I, IV,
9 V, VI, VII, and XIV of the Constitution of the United States.

10 III -C

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action herein, here-
13 inafter and hereinbefore complained of, for deprivations of
14 privileges and immunities under color of authority and pretense
15 of law and negligence.

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ORIGINAL

IV

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Each of the acts and conspiracies herein complained of in subparagraph IX are incorporated herein, hereinafter, and hereinbefore, as causing the injuries and damages to plaintiff by the defendant, its agents, employees or servants.

VII

Each of said acts and conspiracies were done against plaintiff by defendant, its agents, employees or servants, acting under the sole and exclusive management and control of defendant, and in the course of their employment with defendant, its agents, employees and servants.

VIII

Each of said acts and conspiracies and things done were maliciously, willfully, wantonly, intentionally and negligently done against plaintiff by defendant, its agents, employees and servants, under the color of authority and pretense of law, without cause or provocation, in negligent acts or omissions to acts causing plaintiff's injuries.

Ronald Reagan-2980

IX

The negligence and pattern of acts and conspiracies of defendant WESTERN UNION TELEGRAPH COMPANY, its agents, employees or servants, have caused plaintiff serious, severe and permanent injuries:

1. That on or about April 28, 1973, plaintiff paid for telegraphic message to NIXON ADMINISTRATION OFFICIALS, and defendant connived, conspired, and collaborated with defs. FBI, SECRET SERVICE, and others, to suppress, destroy and otherwise not deliver plaintiff's telegraphic message.

2. That beginning on or about April 1973, defendants LAW ENFORCEMENT ASSISTANCE ADMINISTRATION, NIXON ADMINISTRATION OFFICIALS, STATE OF CALIFORNIA, CITY AND COUNTY OF LOS ANGELES, CITY AND COUNTY OF SACRAMENTO, ATT/PTT, WESTERN UNION, and others, connived, conspired and collaborated in political federal funding blackmail to suppress plaintiff's technologies and earn (illegal) campaign contributions or support.

The foregoing wrongful conspiracies and acts done by defendants, and each of them, meant that defendant(s) were not immune from prosecution (28 USC §2680(h)) because defendant(s) were operating within scope of employment and did not use due care toward plaintiff as provided in 28 USC §2680(a) and plaintiff was injured.

Ronald Reagan-2981

X

1
2 Defendant(s) negligently and intentionally conducted them-
3 selves with such a knowing lack of care for the rights of plain-
4 tiff and others that defendant(s) were directly and proximately
5 responsible for the campaign conducted against plaintiff of fear,
6 intimidation, alarm, menace, duress, emotional distress, appre-
7 hension, invasion of privacy, wiretapping, trespass, libel, slan-
8 der, assault, battery, false imprisonment, restraint, illegal
9 search and seizure, and other violations of Civil Rights, and the
10 practice of fraud and deceit upon plaintiff, and all other unlaw-
11 ful acts under color of authority and pretense of law herein
12 complained of.

XI

13
14 Defendant(s) breach of duty and conduct in office has been
15 so negligent and intentionally illegal so as to create an atmos-
16 phere permitting other law enforcement officials, agents, employ-
17 ees and servants, federal, state, county, and city, to do all il-
18 legal acts and things herein complained of, and hereinafter and
19 hereinbefore complained of, against plaintiff without appropriate
20 authorities stopping the illegal acts.

XII

21
22 To Plaintiff's knowledge, information and belief, defen-
23 dant(s), their agents, employees or servants, conspiratorially
24 refused to investigate crimes brought to the attention of appro-
25 priate defendant(s) by plaintiff. Defendant(s) instead chose to
26 maintain this pattern and campaign against plaintiff of assault,
27 battery, trespass, fear, intimidation, duress, alarm, emotional
28 distress, invasion of privacy, trespass, libel, slander, violation
29 of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping
30 and search and seizure, and other acts herein complained of, in
31 gross negligence or willful or wanton disregard to the sworn
32 duties of each of them, under color of authority and pretense of

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XIII

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2983

SIXTY-NINTH CAUSE OF ACTION

I

The Court has jurisdiction in this matter under Title 28, United States Code, Secs. 1343, 1346(b), 2671 etseq., for deprivation of civil rights, assaults by federal police officers acting under color of authority and pretense of law, the enjoinder of unconstitutional actions of state officials, for damages under the Federal Tort Claims Act; controversies to which the United States is a party, United States Constitution, Article III, Section 2; Title 42 United States Code Secs. 1981 et seq., particularly §§ 1982, 1983, 1985, 1986, interference with Civil Rights; redress for violations of the FIRST, FOURTH, and SIXTH Amendments, and the Due Process and Equal Protection Clauses of the FOURTEENTH Amendment to the United States Constitution, Title 28, United States Code, Secs. 1331 et seq.

II

Further, jurisdiction of the Court is invoked under Title 28, United States Code, Secs. 1331 and 1343, this being a suit in equity authorized by law; Title 42, United States Code, Sec. 1983, to be commenced by any citizens of the United States or other person within the jurisdiction thereof to redress the deprivation under color of statute, ordinance, regulation, custom or usage of a State of rights, privileges, and immunities secured by the Constitution and Laws of the United States. The rights, privileges, and immunities sought herein to be redressed are those secured by the First Amendment, and the Due Process and Equal Protection Clauses of the Fourteenth Amendment to the United States Constitution. The matter in controversy, exclusive of interest and costs, exceeds the sum of Ten Thousand Dollars (\$10,000.00).

III

Further, jurisdiction of the Court is invoked because acts of defendants, under color of law and authority, deprived plaintiff

1 of the privileges and immunities guaranteed to plaintiff by
2 Amendments I, IV, V, VI, VII, and XIV of the United States
3 Constitution.

4 III -B

5 Plaintiff does hereby incorporate and adopt by reference,
6 all allegations set forth in JURISDICTION (page 2); Title 28 of
7 the United States Code, Sections 1343 and 1346(b); Title 42 of
8 the United States Code, Section 1981 et seq.; Amendments I, IV,
9 V, VI, VII, and XIV of the Constitution of the United States.

10 III -C

11 Plaintiff does hereby incorporate and adopt by reference,
12 all allegations set forth in all causes of action herein, here-
13 inafter and hereinbefore complained of, for deprivations of
14 privileges and immunities under color of authority and pretense
15 of law and negligence.

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29 Ronald Reagan-2985
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ORIGINAL

IV

Plaintiff BRONSON is a citizen of the United States, and the amount in controversy exceeds Ten Thousand Dollars, and the UNITED STATES is a party.

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

VI

Each of the acts and conspiracies herein complained of in subparagraph IX are incorporated herein, hereinafter, and hereinbefore, as causing the injuries and damages to plaintiff by the defendant, its agents, employees or servants.

VII

Each of said acts and conspiracies were done against plaintiff by defendant, its agents, employees or servants, acting under the sole and exclusive management and control of defendant, and in the course of their employment with defendant, its agents, employees and servants.

VIII

Each of said acts and conspiracies and things done were maliciously, willfully, wantonly, intentionally and negligently done against plaintiff by defendant, its agents, employees and servants, under the color of authority and pretense of law, without cause or provocation, in negligent acts or omissions to acts causing plaintiff's injuries.

Ronald Reagan-2986

IX

1
2 The negligence and pattern of acts and conspiracies of de-
3 fendants WINCHESTER WESTERN/OLIN, REMINGTON ARMS/DUPONT, COLT,
4 their agents, employees or servants, have caused plaintiff ser-
5 ious, severe and permanent injuries:

6 1. That beginning on or about 1971, defendants, their ser-
7 vants, agents and employees, have collaborated, connived, and
8 conspired with the UNITED STATES ARMY to eliminate competition
9 from plaintiff and his firearms and related technologies.

10 2. That beginning on or about 1971, defendants, their ser-
11 vants, agents and employees, have collaborated, connived and con-
12 spired with NIXON ADMINISTRATION OFFICIALS for the defendants'
13 payments of illegal campaign contributions to NIXON OFFICIALS
14 in exchange for which NIXON OFFICIALS, FRI, LEAA, and others,
15 did not permit any federal lawenforcement or military agency to
16 conduct business with plaintiff.

17 3. That beginning on or about 1971, defendants, their ser-
18 vants, agents and employees, have collaborated, connived and con-
19 spired with local retail dealers (gunshops, hardware stores, etc.)
20 and suppressed and stopped any person licensing or implementing
21 plaintiff's technologies for fear of losing defendants' firearms
22 "lines", and thus being forced to go out of business.

23 4. That beginning on or about 1972, defendants, their ser-
24 vants, agents and employees, have collaborated, connived and con-
25 spired with local governments (law enforcement), to suppress
26 plaintiff's technologies from implementation locally.

27 The foregoing wrongful conspiracies and acts done by defen-
28 dants, and each of them, meant that defendant(s) were not immune
29 from prosecution (28 USC §2680(h)) because defendant(s) were oper-
30 ating within scope of employment and did not use due care toward
31 plaintiff as provided in 28 USC §2680(a) and plaintiff was
32 injured.

X

Defendant(s) negligently and intentionally conducted themselves with such a knowing lack of care for the rights of plaintiff and others that defendant(s) were directly and proximately responsible for the campaign conducted against plaintiff of fear, intimidation, alarm, menace, duress, emotional distress, apprehension, invasion of privacy, wiretapping, trespass, libel, slander, assault, battery, false imprisonment, restraint, illegal search and seizure, and other violations of Civil Rights, and the practice of fraud and deceit upon plaintiff, and all other unlawful acts under color of authority and pretense of law herein complained of.

XI

Defendant(s) breach of duty and conduct in office has been so negligent and intentionally illegal so as to create an atmosphere permitting other law enforcement officials, agents, employees and servants, federal, state, county, and city, to do all illegal acts and things herein complained of, and hereinafter and hereinbefore complained of, against plaintiff without appropriate authorities stopping the illegal acts.

XII

To Plaintiff's knowledge, information and belief, defendant(s), their agents, employees or servants, conspiratorially refused to investigate crimes brought to the attention of appropriate defendant(s) by plaintiff. Defendant(s) instead chose to maintain this pattern and campaign against plaintiff of assault, battery, trespass, fear, intimidation, duress, alarm, emotional distress, invasion of privacy, trespass, libel, slander, violation of Civil Rights, fraud, deceit, anti-trust, illegal wiretapping and search and seizure, and other acts herein complained of, in gross negligence or willful or wanton disregard to the sworn duties of each of them, under color of authority and pretense of

law. Plaintiff was prevented and deprived from doing business with defendants, and each of them.

XIII

Defendants, and each of them, owed plaintiff and others a duty to not intentionally, willfully and negligently inflict bodily harm or loss of property upon them, and owed plaintiff and others their sworn duty to protect plaintiff and others from bodily harm and property damage, and defendants, and each of them, intentionally and intentionally and negligently conspired to not perform that duty.

XIV

Defendant(s), its agents, employees and servants, and each of them, in doing the conspiracies and acts herein complained of, negligently, wantonly and willfully and maliciously violated their sworn oaths of office to uphold and defend the Constitution of the United States and the Constitution of the State of California to protect citizens (Cal.Const.Art.XX), under color of authority and pretense of law.

XV

By reason of the wrongful, intentional, and malicious acts, conspiracies and humiliations of plaintiff by defendants, and each of them, and with others, the fright thereby caused plaintiff to suffer extreme and severe mental anguish and physical pain, and injury in mind and body and earning capacity, the nature and extent of which shall be proved at trial, and as incorporated herein under DAMAGES from page 274.

XVI

WHEREFORE, plaintiff demands judgment against defendants, and each of them, the nature, extent, sum and costs of which shall be proved at trial, and for compensatory and punitive damages, and for such other relief as is deemed just and proper by this Court.

Ronald Reagan-2989

1 SEVENTIETH CAUSE OF ACTION

2 I

3 The action arises under the Fourth Amendment to the Consti-
4 tution of the United States, as hereinafter more fully appears.
5 The amount in controversy exceeds, exclusive of interest and
6 costs, the sum of Ten Thousand Dollars.

7 II

8 At all times herein mentioned, plaintiff was, and is, a
9 citizen of the United States, and the UNITED STATES is a party.

10 III

11 Plaintiff does not know the true names and capacities of de-
12 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
13 therefore sues these defendants, and each of them, by such ficti-
14 tious names for damages caused and proximately caused to plaintiff.

15 IV

16 Plaintiff does hereby incorporate and adopt by reference,
17 all allegations set forth in all causes of action herein, here-
18 inafter and hereinbefore complained of, for loss of privileges and
19 immunities under color of authority and pretense of law.

20 V

21 Defendants are:

22 1. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTORS GRAY,
23 RUCKELSHAUS, AND KELLEY.

24 2. Def. AMERICAN TELEPHONE AND TELEGRAPH COMPANY, PACIFIC
25 TELEPHONE COMPANY DIVISION. Ronald Reagan-2990

26 VI

27 Beginning on or about 1971, defendants, and each of them,
28 their agents, employees or servants, in doing the things herein-
29 after mentioned, acted under the color of authority and pretense
30 of law and deprived plaintiff of the protections, privileges and
31 immunities of Amendments I, IV, V, VI, VII and XIV, U.S. Constitution,
32 and Amendment XIV's Due Process and Equal Protection Clauses.

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VII

Beginning on or about 1971, defendant(s), and others, have maliciously, willfully, intentionally, negligently and without warrant maintained plaintiff under constant business telephone wiretap or other illegal electronic monitoring device. Defendant(s), and each of them, and with others, have maliciously forced the business telephone to "ring" at odd nonbusiness hours, ring incessantly or brokenly, mechanically contrive or otherwise the sounds or voices of callers, and other wrongful acts herein, hereinafter and hereinbefore complained of. Defendant(s), and each of them, have maliciously and deliberately made the business telephone inoperative, disconnected, cutting into business telephone conversations, and subjecting plaintiff's business telephone conversations to the "special attentions" of def. PTT's "Unit 2" operators.

VIII

Plaintiff in no way consented to the wiretapping, electronic eavesdropping and interference, or warrantless search, nor did plaintiff authorize any of these wrongful acts against his privacy and business telephone conversations, all of these wrongful acts being done willfully, maliciously, intentionally, and negligently against plaintiff.

Ronald Reagan-2991
IX

The above-mentioned acts and conduct of the defendants, and each of them, claimed by them to be under federal authority, constituted an abuse of their federal authority and regulated Public Utility authority and was not within their scope of employment as federal agents, employees or servants, in that their acts and conduct were not based on the exercise or performance of a discretionary function or duty assumed by them as agents of the FEDERAL BUREAU OF INVESTIGATION or telephonic public utility and were not acts and conduct done pursuant to the regulations of the

1 FEDERAL BUREAU OF INVESTIGATION or public telephonic utility, and
2 were acts performed within the scope of defendants employment
3 but without exercising due care while acting within the scope of
4 their employment, and defendants, and each of them, acted in
5 fraud, corruption or malice.

6 X

7 As a result of the above-mentioned and aforementioned acts
8 and conduct of the defendants, and each of them, plaintiff was
9 deprived of his right to be secure in his person, papers, and
10 effects against unreasonable and warrantless searches and seizures
11 by federal agents, employees, or servants, acting under color or
12 claim of federal authority, as guaranteed to him by the Fourth
13 Amendment to the Constitution of the United States.

14 XI

15 As a result of such deprivation, plaintiff suffered great
16 humiliation, embarrassment, mental anguish, and pain to his head
17 and body, and loss of earning capacity, the nature and extent of
18 plaintiff's injuries and damages which shall be proved at trial,
19 and as incorporated herein under DAMAGES from page 274.

20 XII

21 WHEREFORE, plaintiff demands judgment against defendants, and
22 each of them, the nature, extent, sum and costs of which shall be
23 proved at trial, and for compensatory and punitive damages, and
24 for such other relief as is deemed just and proper by this Court.

25 SEVENTY-FIRST CAUSE-OF ACTION

26 I -A

27 Plaintiff does hereby incorporate and adopt by reference, all
28 allegations set forth in all causes of action herein, hereinafter
29 and hereinbefore complained of, for loss of privileges and immuni-
30 ties under color of authority and pretense of law.

31 Ronald Reagan-2992

1
2 I -B

3 The action arises under the Fourth Amendment to the Constitu-
4 tion of the United States, as hereinafter more fully appears. The
5 matter in controversy exceeds, exclusive of interest and costs,
6 the sum of Ten Thousand Dollars.

7 II

8 At all times herein mentioned, plaintiff was, and now is, a
9 citizen of the United States.

10 III

11 On or about August 22, 1975, defendants, and each of them,
12 were federal agents employed by the FEDERAL PROTECTIVE SERVICE
13 (FPS/GSA) and LUV SECURITY SERVICE (LUV), and in doing the things
14 hereinafter mentioned, acted under the color of their federal au-
15 thority as such.

16 IV

17 On or about August 22, 1975, when plaintiff was going to his
18 post office box in the United States Post Office, plaintiff was
19 assaulted by one "VICTOR MARTINEZ", said "MARTINEZ" having walked,
20 followed, gestured to, and watched plaintiff around Sacramento
21 County and now the Post Office. Plaintiff became so alarmed for
22 his personal safety at the hands of "MARTINEZ" that plaintiff com-
23 plained to the federal FPS and LUV officers and warned them that
24 plaintiff would place "MARTINEZ" under citizens arrest the next
25 time "MARTINEZ" appeared and assaulted plaintiff in the Post Off-
26 ice. Defendant FPS and LUV OFFICERS requested that plaintiff re-
27 turn to the Post Office with documentation concerning "MARTINEZ".

Ronald Reagan-2993

28 V

29 On August 22, 1975, in less than one hour plaintiff returned
30 to the Post Office with documentation concerning "MARTINEZ" as re-
31 quested by defendant FPS OFFICERS CHASTAINE AND CLEMONS, AND LUV
32 OFFICERS SMITH AND GREER, when the defendants CHASTAINE, CLEMONS

1 and GREER wrongfully and unlawfully violated plaintiff's constitu-
2 tionally protected right to be free from unreasonable search and
3 seizure in that defendants, and each of them, attacked, beat, re-
4 strained, handcuffed, strangled, falsely arrested, falsely impri-
5 soned, and otherwise abused plaintiff, without cause or provoca-
6 tion, without search warrant, unlawfully search plaintiff, where
7 plaintiff was subjected to other indignities and held incommuni-
8 cado for almost one hour. PLAINTIFF WAS NOT ARRESTED.

9 VI

10 On August 22, 1975 defendants FPS OFFICER JAMES CHASTAINE
11 and LUV OFFICER GREER further deprived plaintiff of his freedom
12 and forcibly took plaintiff from the United States Post Office
13 and forcibly took plaintiff to his business automobile parked in
14 a private parking lot one block away. Plaintiff was menaced by
15 said defendants, and each of them, for some time at plaintiff's
16 business auto. Plaintiff not only feared for his continued per-
17 sonal safety from deadly weapons or fists, but feared for the per-
18 sonal safety of innocent by-standers as well. Defendants had no
19 cause or provocation to so act.

20 VII

21 Plaintiff in no way consented to the unreasonable search,
22 seizure, beating, handcuffing, strangulation, false imprisonment,
23 and other restraint, nor did plaintiff submit himself/to the con- voluntarily
24 trol and custody of the defendants, nor did plaintiff authorize
25 any of these wrongful acts against his person, all of these wrong-
26 ful acts being done willfully, maliciously, intentionally, and
27 negligently against plaintiff by force of three (3) federal offi-
28 cers beating plaintiff.

Ronald Reagan-2994

29 VIII

30 The above-mentioned acts and conduct of the defendants, and
31 each of them, claimed by them to be under federal authority, con-
32 stituted an abuse of their federal authority and was not within

1 their scope of employment as federal agents in that their acts
2 and conduct were not based on the exercise or performance of a
3 discretionary function or duty assumed by them as agents of the
4 FEDERAL PROTECTIVE SERVICE and were not acts and conduct done
5 pursuant to the regulations of the FEDERAL PROTECTIVE SERVICE,
6 and were acts performed within the scope of defendants employment
7 BUT WITHOUT EXERCISING DUE CARE WHILE ACTING WITHIN THE SCOPE OF
8 THEIR EMPLOYMENT, and defendants, and each of them, acted in
9 fraud, corruption or malice.

10 IX

11 As a result of the above-mentioned and aforementioned acts
12 and conduct of the defendants, and each of them, plaintiff was
13 deprived of his right to be secure in his person, papers, and ef-
14 fects against unreasonable searches and seizures by federal agents
15 acting under color or claim of federal authority, as guaranteed
16 to him by the Fourth Amendment to the Constitution of the United
17 States.

18 X

19 As a result of such deprivation, plaintiff suffered great
20 humiliation, embarrassment, mental anguish, and pain to his head
21 and body, requiring medical care and treatment, /the nature and extent of plaintiff's injuries and dam-
22 ages which shall be proved at trial, and as incorporated herein
23 under DAMAGES from page 274.

24 XI

25 WHEREFORE, plaintiff demands judgment against defendants,
26 and each of them, the nature, extent, sum and costs of which shall
27 be proved at trial, and for compensatory and punitive damages,
28 and for such other relief as is deemed just and proper by this
29 Court.

30 Ronald Reagan-2995

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32

1 SEVENTY-SECOND CAUSE OF ACTION

2 I

3 Plaintiff brings this civil action seeking treble damages and
4 injunctive relief for injuries and threatened and continuing in-
5 juries to his business, property and trade caused by defendants'
6 monopolistic practices, unreasonable conspiracies and restraints
7 of trade and other violations of the Sherman and Clayton Acts for
8 jurisdiction of this Court under 15 USC §§15,26,1,2,13,18; and
9 28 USC §1337.

10 II

11 Plaintiff does hereby incorporate and adopt by reference, all
12 allegations set forth herein, hereinafter and hereinbefore com-
13 plained of for interference with interstate commerce and competition.

14 III

15 Plaintiff GEORGE A BRONSON is President of Anchor Internation-
16 al, Inc., a California corporation, having its principal place
17 of business in Sacramento, California. Plaintiff is a Yale grad-
18 uate Inventor and Patent Holder of Record in the United States,
19 NATO and other allied countries. Plaintiff is the Inventor and
20 Patent Holder of United States Patent No. 3,543,428, author and
21 owner of proprietary, new, efficient lifesaving technologies se-
22 lectively published in "ANCHOR INTERNATIONAL WEAPONS TRAINING
23 FIRING MANUAL AND BRONSON STRINGFIRE METHOD".

24 IV

25 Defendants are found and transact business in States of Mary-
26 land, Virginia, Delaware, New York, California, Washington, D.C.,
27 Connecticut, and elsewhere. Ronald Reagan-2996

28 V

29 Plaintiff does not know the true names and capacities of de-
30 fendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and
31 therefore sues these defendants, and each of them, by such ficti-
32 tious names for damages caused and proximately caused to plaintiff.

V

Defendants are:

1. Def. UNITED STATES ARMY, headquarters The Pentagon, Washington, D.C., for the Aberdeen Proving Grounds, Aberdeen, Maryland, and elsewhere.

2. Def. WINCHESTER-WESTERN DIVISION of the OLIN CORPORATION, Stamford, Connecticut.

3. Def. REMINGTON ARMS DIVISION of the DUPONT DE NEMOURS CORPORATION, Wilmington, Delaware.

4. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTORS L.P. GRAY, WILLIAM RUCKELSHAUS, CLARENCE M. KELLEY, headquarters Washington, D.C.

5. Def. NATIONAL RIFLE ASSOCIATION of AMERICA, 1600 Rhode Island Avenue, N.W., Washington, D.C.

6. Def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION of the UNITED STATES DEPARTMENT OF JUSTICE, headquarters Washington, D.C.

7. Def. INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, INC., headquarters 11 Firstfield Road, Gaithersburg, Maryland.

8. Def. NATIONAL SHERIFFS ASSOCIATION, 1250 Connecticut Avenue, N.W., Washington, D.C., headquarters.

9. Defs. NIXON ADMINISTRATION WHITE HOUSE OFFICIALS, 1600 Pennsylvania Avenue, Washington, D.C.

10. Def. COLT INDUSTRIES, INC., headquarters New York City.

11. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER and GOVERNOR RONALD REAGAN, State Capitol, Sacramento, CA.

12. Def. LOS ANGELES CITY AND COUNTY, SHERIFF PETER PITCHESS, LOS ANGELES POLICE CHIEF EDWARD DAVIS, Los Angeles, California.

13. Def. SACRAMENTO COUNTY, SHERIFF DUANE LOWE, DISTRICT ATTORNEY JOHN PRICE, 720 - 9th Street, Sacramento, California.

14. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE, CHIEF WILLIAM J. KINNEY,

Ronald Reagan-2997

ORIGINAL

1 15. Def. FEDERAL PROTECTIVE SERVICE, OFFICERS CHASTAINE,
2 CLEMONS and SNELSON, Sacramento, California.

3 16. Def. STATE OF CALIFORNIA, CALIFORNIA HIGHWAY PATROL,
4 COMMISSIONER GLENDON B. CRAIG, headquarters Sacramento, California.

5 17. Def. STATE OF CALIFORNIA, STATE POLICE, OFFICERS WESTON
6 and SHERWOOD, CHIEF GUY R. OATES, headquarters Sacramento, CA.

7 18. Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr.,
8 MARC POCHE, State Capitol, Sacramento, California.

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VIII

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Defendants known to plaintiff in his belief include officers, agents and employees, active and retired: UNITED STATES ARMY, The Pentagon, Washington, D.C. 20310 (headquarters), and elsewhere; WINCHESTER WESTERN INTERNATIONAL DIVISION of the OLIN CORPORATION, 120 Long Ridge Road, Stamford, Connecticut 06904; REMINGTON ARMS COMPANY, INC., DIVISION of E.I. DUPONT DE NEMOURS, INC., 1007 Market Street, Wilmington, Delaware 19393; COLT INDUSTRIES, INC., 430 Park Av., New York 10022, firearms manufacturers in interstate commerce.

In 1971 Defendant UNITED STATES ARMY did perform an incorrect and fraudulent technical analysis of Plaintiff BRONSON's firearms technology, and particularly plaintiff's United States Patent No. 3,543,428, "RIFLE FORESTOCK", and associated STRINGFIRE technology, at Aberdeen Proving Ground, Aberdeen, Maryland. Defendants herein named, with full knowledge of the facts as to the law, custom, policies and practices permitting retesting upon petition, did knowingly and unlawfully combine, conspire, agree and have a tacit understanding together with each other and other defendants, to refuse to retest and correct its original wrongful analysis of plaintiff BRONSON's technologies, despite plaintiff's petitions and providing of additional technologies, to restrain a part of the trade and commerce in firearms/and related technologies among the several States of the United States and did, in fact, restrain said trade and commerce in violation of Section 1 of the Sherman Anti-Trust Act.

It was a part of said combination and conspiracy, and the object and purpose thereof to accomplish the following, among other things, to-wit:

(1) To arbitrarily, unlawfully, unreasonably and knowingly raise, fix, control, set, stabilize and effect the price and manu-

1 facture firearms and related technologies shipped in interstate
2 commerce, as aforesaid, in to the State of California and any of
3 the Sister States of the United States of America.

4 (2) To arbitrarily, unlawfully, unreasonably and knowingly
5 prevent, suppress and eliminate competition between defendants
6 and among the defendant manufacturers of firearms and related
7 technologies sales from shipment in interstate commerce, as afore-
8 said, in to the State of California and any of the Sister States
9 of the United States of America.

10 (3) To arbitrarily, unlawfully, unreasonably and knowingly
11 prevent, suppress and eliminate competition from competitors and
12 prospective competitors of the defendant manufacturers of firearms
13 and related technologies and Defendants WINCHESTER, REMINGTON,
14 AND COLT in the manufacture and sale of firearms and related tech-
15 nologies shipped in interstate commerce, as aforesaid, into the
16 State of California and any other State of the United States.

17 (4) To arbitrarily, unlawfully, unreasonably and knowingly
18 prevent, suppress and eliminate competition from any source in
19 the sale and manufacture of firearms and related technologies
20 shipped in interstate commerce, as aforesaid, into the State of
21 California and any other State of the United States.

22 (5) To establish and maintain unreasonably high, excessive,
23 monopolistic and non-competitive prices and controls for firearms
24 and related technologies shipped in interstate commerce, as afore-
25 said, into the State of California and any other State of the
26 United States.

Ronald Reagan-3000

IX

28 As a part of said unlawful combination and conspiracy, in
29 pursuance thereof and in furtherance thereof and to effectuate
30 its object and purpose, the said defendants within the U.S. ARMY
31 did:

32 (1) In 1971, and continuing to present time, entered into

1 an agreement and understanding with defendant firearms manufac-
2 turers, acting on behalf of all defendants, and each of them,
3 whereby all sales in the State of California and any other State
4 of the United States of firearms and related technologies would
5 not include Plaintiff BRONSON's firearms technologies and Patent.
6 Said agreement and understanding continue in force and effect at
7 all times from the period as stated.

8 (2) In 1971, and continuing to present time, entered into
9 agreement and understanding with defendant firearms manufacturers,
10 acting on behalf of all defendants, and each of them, whereby
11 Defendant U.S. ARMY did knowingly, intentionally, and wrongfully
12 release its incorrect technical analysis of Plaintiff BRONSON's
13 technologies which Defendant ARMY refused to correct, so that only
14 the firearms and related technologies manufactured by the de-
15 fendant manufacturers, would be acceptable and in accordance with
16 Army specifications and standards, remove from the industry newly
17 invented technology of superior weaponry, thereby eliminating
18 competition from competitive and prospective competitors of de-
19 fendant firearms manufacturers, and each of them. Said agreement
and understanding continue in force and effect to present time.

20 (3) In or about 1971, Defendant U.S. ARMY changed, and
21 caused to be changed the specifications and standards regarding
22 manufacture and sale to the United States Government of firearms
23 in concert, collusion and conspiracy with defendant firearms man-
24 ufacturers, and each of them, at the same time and thereafter
25 failing or refusing to furnish said notice fully to competitors
26 and prospective competitors of said defendant manufacturers of
27 firearms and related technologies.

28 (4) At all times after the date of the change in said speci-
29 fications and standards referred to in sub-paragraph (3) above,
30 Defendant ARMY, acting in the capacity of purchasing agent for
31 the United States Department of Defense and others, notified the
32 defendant firearms manufacturers, and each of them, at the same

Ronald Reagan-3002

1 time and thereafter failing and refusing to fully notify compet-
2 itors and prospective competitors of said defendant firearms man-
3 ufacturers, and each of them.

4 (5) At all times after said change in the specifications,
5 Defendant ~~ARMY~~, acting in the capacity of purchasing agent for
6 the U.S. Department of Defense and others, and in concert, collu-
7 sion and conspiracy with defendant firearms manufacturers, and
8 each of them, surreptitiously rewarded defendant firearms manu-
9 facturers, and each of them, with new and extra considerations
10 in the purchase of firearms without bids as rigged/fixed "follow-ons
11 to existing contracts, without requesting the submitting of bids
12 by competitors and prospective competitors to defendant firearms
13 manufacturers, and each of them.

14 (6) In further pursuance of the aforesaid arrangements and
15 agreements, set forth in sub-paragraphs (1) through (5), inclu-
16 sive, Defendant UNITED STATES ARMY provided extraordinary, behind-
17 the-scenes assistance to firearms manufacturer def. COLT INDUSTRIES
18 during subsequent Federal Bureau of Investigation attempt to
19 uncover the coverup of inferior firing characteristics of the
20 M-16 rifle.

21 (7) As a result of said agreements and understandings, De-
22 fendant ARMY, acting in concert and collusion with defendant
23 firearms manufacturers, and each of them, in furtherance of said
24 combination and conspiracy, knowingly and deliberately divided
25 large orders for firearms and related technologies under the juris-
26 diction of the U.S. Department of Defense, into numerous small
27 orders, for the purpose of awarding said small orders to the de-
28 fendant firearms manufacturers, and each of them, without receiv-
29 ing competitive bids therefor, at a price fixed and agreed upon
30 by said defendants.

31 (8) During the period from 1971 to present, inclusive, as
32 a result of the operation of said combination and conspiracy,

1 through the arrangements, agreements and acts set forth in sub-
2 paragraphs (1) through (7) preceding, defendant firearms manu-
3 facturers, and each of them, received commission or other compen-
4 sation on each firearm and other technology sold to and purchased
5 by the UNITED STATES, at prices raised, enhanced, fixed, main-
6 tained and controlled as aforesaid.

7 (9) During the period from 1972 to present, inclusive, as
8 a result of the operation of said combination and conspiracy,
9 through the arrangements, agreements and acts set forth in sub-
10 paragraphs (1) through (7) preceding, defendant firearms manu-
11 facturers, and each of them, used the "new" price, contract, and
12 business relationship with def. ARMY and NIXON ADMINISTRATION to
13 conspire against, collaborate with, or coerce persons and local
14 retail gun dealers to purchase the defendant(s) firearms "lines"
15 at prices raised, enhanced, fixed, maintained and controlled as
16 aforesaid, threatening to withhold said "lines" should any person
17 and local retail gun dealer license, manufacture, sell, or imple-
18 ment in any way plaintiff's firearms and related technologies,
19 and force local businessmen to lose earnings and profits.

20 (10) Incorporating the acts and agreements set forth in sub-
21 paragraph (9) above, defendant firearms manufacturers conspired
22 against, collaborated with, or coerced local governments in simi-
23 lar manner.

Ronald Reagan-3003

24 X

25 While said conspiracy, arrangement and understanding between
26 the defendants, and each of them, was in existence, the UNITED
27 STATES purchased from defendant firearms manufacturers, and each
28 of them, doing business as WINCHESTER WESTERN, REMINGTON ARMS,
29 COLT INDUSTRIES, and firearms manufacturers each of them, a total
30 of billions of dollars for firearms and related technologies,
31 which price was unreasonable and excessive due to the unlawful
32 and illegal conspiracy, agreements and arrangements between the

1 defendants named herein to raise, fix, maintain, enhance and con-
2 trol said prices. The reasonable price at which said amount of
3 firearms and related technologies could have been purchased under
4 natural and free competitive conditions was millions of dollars
5 less which shall be demonstrated at trial. As a result of said
6 conspiracy so existing at the time these purchases were made from
7 said defendants, and each of them, Plaintiff BRONSON and the
8 State of California and any other State of the United States have
9 suffered damage and injury in their property in actual amounts
10 to be demonstrated at trial, and are entitled under Section 4 of
11 said Sherman Anti-Trust Act, Title 15, United States Code Anno-
12 tated, Section 15, to threefold damages to be demonstrated at
13 trial, and as incorporated herein under DAMAGES from page 274.

14 XI

15 WHEREFORE, Plaintiff demands judgment against the defendants,
16 and each of them, the sum and costs of which shall be demonstra-
17 ted at trial and treble damages, together with reasonable counsel
18 fee and costs, and for such other relief as is deemed just and
19 proper by this Court, that a temporary restraining order and pre-
20 liminary injunction may be issued out of this Court upon its order
21 directing the defendant(s) and their agents, servants and employ-
22 ees, from in any manner interfering with the plaintiff in fire-
23 arms and related technologies, and that after a trial of this
24 cause that said injunction may be made perpetual; that a decree
25 issue from the Court that the conspiracies and acts tended to
26 create a wrongful monopoly in the firearms and related technolo-
27 gies industries, and are to stop and void, and that all conspir-
28 acies and/or contracts wrongfully entered into between defendants,
29 and each of them, are null and void; and a reasonable attorney's
30 fee beside the costs and disbursements of this action.

31 Ronald Reagan-3004

1
2 SEVENTY-THIRD CAUSE OF ACTION

3 I

4 Plaintiff does hereby incorporate and adopt by reference,
5 all allegations set forth in JURISDICTION (page 2).

6 II

7 This Court has jurisdiction under 15 USC §2, Sherman Act,
8 and 28 USC §1337.

9 III

10 Plaintiff does hereby incorporate and adopt by reference,
11 all of the wrongful acts herein complained of, hereinafter and
12 hereinbefore, specifically and especially 72nd - 75th causes of action.

13 IV

14 Plaintiff is a citizen of the United States.

15 V

16 Defendant(s), its officer, agents, employees, or servants,
17 UNITED STATES ARMY, WINCHESTER WESTERN/OLIN, REMINGTON/DUPONT,
18 COLT, NATIONAL RIFLE ASSOCIATION, FEDERAL BUREAU OF INVESTIGATION,
19 WHITE HOUSE OFFICIALS, FEDERAL, STATE, COUNTY AND CITY OFFICIALS,
20 NATIONAL RIFLE ASSOCIATION (NRA), and others, through collabora-
21 ting, cooperating and conspiring have entered into plans and
22 schemes, the purposes of which are to completely control the
23 firearms and related technologies industries and suppress the
24 firearms technologies of plaintiff and restrict or prevent plain-
25 tiff from doing business in the firearms and related technologies
26 industries.

Ronald Reagan-3005

27 VI

28 Beginning in or about 1971 the U.S.ARMY published to defen-
29 dants, and each of them, false analysis of plaintiff's technolo-
30 gies. Beginning in or about 1971 and continuing day to day there-
31 after to the present, the defendants herein named, together with
32 diverse other persons, well knowing all of the foregoing facts,

1 knowingly and unlawfully did monopolize, attempt to monopolize,
2 and did combine and conspire with each other and other persons
3 to monopolize a part of the trade and commerce in firearms among
4 the several States of the United States, in violation of Section
5 2 of the Sherman Anti-Trust Act.

6 VII

7 It was a part of said unlawful monopoly, attempt to monopo-
8 lize, and combination and conspiracy to monopolize, and the ob-
9 ject and purpose thereof, to effect and accomplish the following,
10 among other things, to-wit:

11 (1) To create and maintain a monopoly in the sale and manu-
12 facture of firearms and related technologies shipped in inter-
13 state commerce, as aforesaid, in the State of California and any
14 other State of the United States.

15 (2) To arbitrarily, unlawfully, unreasonably and knowingly
16 raise, fix, control, act, stabilize and affect the price of fire-
17 arms and related technologies shipped in interstate commerce,
18 as aforesaid, into the State of California and any other State
19 of the United States, and purchased by the U.S. Department of
20 Defense and others, for and on behalf of the State of California,
21 United States Government, and others.

22 (3) Establish and maintain unreasonably high, excessive,
23 monopolistic and non-competitive prices on firearms and related
24 technologies shipped in interstate commerce, as aforesaid, into
25 the State of California and other States, for purchase and use
26 by the State of California, Department of Defense, and others,
27 for and on behalf of the State of California, U.S. Department of
28 Defense and others. Ronald Reagan-3006

29 (4) Arbitrarily, unlawfully, unreasonably and knowingly to
30 prevent, suppress, and eliminate competition in the sale and
31 manufacture of firearms and related technologies shipped in inter-
32 state commerce, as aforesaid, into the State of California and

1 any other State and others, through respective purchasing agents.

2 VIII

3 As a part of the unlawful monopoly, attempt to so monopolize,
4 and combination and conspiracy to monopolize and pursuant thereto
5 and in furtherance and to effectuate its object and purposes de-
6 fendants herein named and diverse other persons, did:

7 (1) through (9), inclusive subparagraphs of Paragraph IX
8 of the SEVENTY-SECOND CAUSE OF ACTION of this complaint are here-
9 by incorporated and adopted by reference to all allegations set
10 forth by Plaintiff BRONSON.

11 (10) In or about 1971, defendants ARMY and firearms manu-
12 facturers, and each of them, and other defendants, organized and
13 caused to be organized a criminal conspiracy against Plaintiff
14 BRONSON to nationally suppress his newly invented firearms tech-
15 nologies and Patent, by not fairly analyzing, licensing, manu-
16 facturing, selling or shipping plaintiff's firearms technologies
17 and Patent in interstate commerce to the State of California or
18 any other State. Ronald Reagan-3007

19 (11) In or about 1972, defendants firearms manufacturers,
20 and each of them, and other defendants, organized and caused to
21 be organized a criminal conspiracy against Plaintiff BRONSON to
22 maintain national suppression of plaintiff's newly invented fire-
23 arms technologies and Patent, by making illegal campaign contri-
24 butions to the Nixon Reelection Campaign of thousands of dollars.

25 (12) In or about 1972, defendants firearms manufacturers,
26 and each of them, and other defendants, organized and caused to
27 be organized a criminal conspiracy against Plaintiff BRONSON to
28 maintain a national suppression of plaintiff's newly invented
29 superior firearms technologies and Patent, by covering-up Army-
30 Nixon Administration scandals concerning the technologically infer-
31 ior M-16 rifle and other lifesaving technologies of plaintiff
32 which would have shortened the Vietnam War and saved lives.

(13)

1 /When members of the law enforcement community inquired about im-
2 proving the M-16 rifle with plaintiff's technology, defendant(s)
3 conspired against, collaborated with, or coerced said law enforce-
4 ment communities with threats to withhold that law enforcement
5 community from consideration for training under defendant FEDERAL
6 BUREAU OF INVESTIGATION, and others.

7 (14) Beginning in or about 1971, defendants firearms manu-
8 facturers, and others, conspired, agreed, understood, collaborated
9 with and coerced among themselves and with others, the result of
10 which was to destroy plaintiff's benefits and property in United
11 States Patent No. 3,543,428, "Rifle Forestock", in the years from
12 issuance of Patent. Plaintiff BRONSON now holds in reserve re-
13 lated technologies.

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Ronald Reagan-3009

1 (15) In or about 1971, defendants ARMY and firearms manu-
2 facturers, and each of them, and other defendants, knowingly,
3 wilfully, and maliciously conspired and agreed among themselves
4 to destroy plaintiff's business, firearms and related technolo-
5 gies reputation, by threats of coercion, intimidation, defamation,
6 economic reprisals, etc., against federal, state, county, city,
7 local, or private firearms users, local sports and firearms deal-
8 ers, local law enforcement, sports shooters, etc., in order to
9 maintain economic and technological control and monopoly of the
10 firearms industry. Local dealers were placed in fear for their
11 own business economic health, that if dealers displayed and/or
12 licensed and/or offered for sale Plaintiff BRONSON's firearms
13 technology, the local dealers would "lose the Winchester line",
14 "lose the Remington line", "lose the Colt line", etc. Defendants
15 and each of them, intend to suppress plaintiff's Patent for the
16 seventeen (17) years of plaintiff's proprietary ownership as
17 granted by the United States Patent Office, and after seventeen
18 years of defrauding plaintiff, take plaintiff's patent for "free".

19 (16) In or about 1972, defendants FBI and NRA, and each of
20 them, and other defendants, organized and caused to be organized
21 a criminal conspiracy against Plaintiff BRONSON to maintain a
22 national suppression of plaintiff's newly invented superior fire-
23 arms training technologies and Patent, by covering-up Army-Nixon
24 Administration scandals concerning the technologically inferior
25 M-16 rifle and other life saving technologies of plaintiff, which
26 would have saved thousand of American lives in Vietnam and law
27 officer lives in America, and which would have turned the tide
28 for the winning of the Vietnam War for America.

29 (17) In or about 1972, defendants WHITE HOUSE officials
30 and FBI, and each of them, and other defendants, in return for
31 WHITE HOUSE receipt of illegal campaign contributions toward the
32 reelection of Nixon, organized and caused to be organized a crim-

1 inal conspiracy against Plaintiff BRONSON to nationally suppress
2 plaintiff's firearms and related technologies, by assuring, con-
3 tinuing, maintaining, and otherwise effecting suppression of plain-
4 tiff's technologies:

5 (a) By intimidation of, harassment of, coercion of, threats
6 against, defamation, economic reprisals, political reprisals,
7 social reprisals, and so on and on, against federal, state, city,
8 county, local government, agencies or groups, and private individ-
9 uals, agencies or groups.

10 (b) By intimidation of, harassment of, coercion of, threats
11 of bodily harm, assault, illegal wiretap, destruction to business
12 property and business reputation, and other wrongful acts against
13 plaintiff complained of herein in this complaint.

14 (16) In or about 1972, defendants ARMY and NATO General
15 ALEXANDER HAIG, and each of them, and other defendants, organized
16 and caused to be organized a criminal conspiracy against Plaintiff
17 BRONSON to withhold from NATO plaintiff's new military technologies,
18 and deny NATO newly efficient and superior lifesaving military
19 programs, efficiency and security:

20 (a) To suppress plaintiff's technologies and maintain mono-
21 polies in restraint of trade with other defendants;

22 (b) To suppress and cover-up of the scandalously technically
23 inferior M-16 rifle from NATO and American mothers and fathers
24 of sons who died needlessly in Vietnam, and the American public
25 in general, and the fact that the Vietnam War could have been
26 turned to a winning tide by plaintiff's firearms technologies;

27 (c) To suppress the fact that ranking generals of the UNITED
28 STATES ARMY, due to commercial-industrial ties and collusions,
29 betrayed America and America's fighting men and acted in treason
30 in violation of the United States Constitution to coverup the
31 inferior M-16 rifle by suppressing illegally Plaintiff BRONSON's
32 new efficient lifesaving technologies and Patent.

1 (19) From about 1971, and continuing to present time, defendants
2 U.S. ARMY and firearms manufacturers, and each of them, organized
3 and caused to be organized a conspiracy and acts of suppression
4 of plaintiff BRONSON's firearms and related technologies, the re-
5 sult of which denies to America still other technologies now held
6 in reserve, but which in total would have contained the advance
7 of Communism in Southeast Asia, and saved many thousands of
8 American Marines and soldiers lives. This is treason on the part
9 of the UNITED STATES ARMY, documented and evidenced, and several
10 ranking ARMY officers and generals have, in fact, been traitors
11 to the American public, flag and Constitution.

12 (a) The ARMY's absolute refusal to have any officer of the
13 UNITED STATES ARMY communicate any interest or document in writ-
14 ing toward Inventor BRONSON's new "breakthrough maximum shock-
15 long range .255 CKV Infantry Projectile Bullet for NATO, U.S.
16 Marine Corps, U.S. Army, and Police-Law Enforcement. Breakthrough
17 technology from AII has forged a ballistically superior projectile
18 of long-range targetability in combination with a heretofore un-
19 realized maximum and legal ballistic shock power at all combat
20 ranges."

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29 Ronald Reagan-3011
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1 (20) In or about 1971, and continuing to present time, de-
2 fendants, and each of them, organized and caused to be organized
3 a criminal conspiracy to falsely and maliciously restrain and
4 suppress plaintiff's participation in business activities and
5 trade and commerce in the firearms and related technologies'
6 industries in competition and potential competition with defen-
7 dants.

8 (21) In or about 1971, and continuing to present time, de-
9 fendants, and each of them, organized and caused to be organized
10 a criminal conspiracy to cheat and defraud plaintiff of the use
11 and enjoyment of plaintiff's Inventions, Patent and related fire-
12 arms technologies' properties, through conspiracy, restraint of
13 trade and commerce illegally, illegal campaign contributions,
14 wiretap without warrant, assaults, violations of plaintiff's civil
15 rights, negligences toward plaintiff, etc., and other wrongful
16 acts against plaintiff complained of herein in this complaint,
17 for the seventeen (17) years of plaintiff's Patent, and to con-
18 tinue until stopped by this Court.

19 (22) In or about 1971, and continuing to present time, de-
20 fendants, and each of them, organized and caused to be organized
21 a criminal conspiracy to falsely and maliciously interfere with
22 plaintiff's business relations or advantages by intentional and
23 improper methods of diverting or taking business from plaintiff
24 which are not within the privilege of fair competition.

25 (23) Plaintiff incorporates sub-paragraph (13) above, and
26 states that on August 23, 1973, plaintiff's telephone communica-
27 tion with firearms manufacturer representative, an agent of De-
28 fendant FEDERAL BUREAU OF INVESTIGATION cut into the telephone
29 conversation and stopped all transmission, and caused plaintiff's
30 business telephone to be "out of order" for some time after the
31 aborted telephone conversation. This firearms firm is now reluc-
32 tant to communicate with plaintiff.

Re: Ronald Reagan-3012

1 (14. From about 1971, and continuing to present time, de-
2 fendants, and each of them, organized and caused to be organized
3 a criminal conspiracy to maintain prices, costs, contracts, trade,
4 commerce, industry control, competition availability, etc., paid
5 by the State of California, U.S. Department of Defense, and others,
6 for firearms and related technologies were unreasonable and ex-
7 cessive and were dictated, controlled, set and fixed in the
8 monopoly, attempt to monopolize, and the combination and conspir-
9 acy to monopolize in the manner set forth herein in sub-paragraphs
10 (1) through (24), inclusive, of Paragraph VIII of plaintiff's
11 SEVENTY-THIRD CAUSE OF ACTION.

12 IX

13 The monopoly, attempt to monopolize and combination and con-
14 spiracy to monopolize, herein alleged was commenced and has been
15 operated and carried on by said defendants, and each of them, dur-
16 ing and throughout the period of time aforesaid and in pursuance
17 thereof by said defendants named in this complaint, especially
18 defendants and conspiracy and acts identified and incorporated
19 herein from sub-paragraphs (1) through (24) , inclusive, of Para-
20 graph VIII of the herein SEVENTY-THIRD CAUSE OF ACTION.

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22 X

23 Defendants, and each of them, did do all of the acts, other
24 acts, things, and other things, hereinbefore and hereinafter
25 alleged.

Ronald Reagan-3013

26 XI

27 While said conspiracy, arrangement and understanding between
28 the defendants, and each of them, named herein was in existence,
29 the U.S. Department of Defense, the State of California, and others,
30 purchased from defendants and defendant firearms manufacturers,
31 and each of them, doing business as WINCHESTER WESTERN, REMINGTON
32 ARMS, COLT INDUSTRIES, FEDERAL BUREAU OF INVESTIGATION TRAINING

1 HEADQUARTERS (QUANTICO, VIRGINIA), and others, firearms manufact-
2 urers and related industry activities, a total of billions of dol-
3 lars for firearms and related technologies, which price was unrea-
4 sonable and excessive due to the unlawful and illegal conspiracy,
5 agreements and arrangements among the defendants, and each of them,
6 named herein to raise, fix, maintain, enhance and control said
7 prices. The reasonable price at which said amount of firearms
8 and related technologies could have been purchased under natural
9 and free competitive conditions was millions of dollars less
10 which will be demonstrated at trial. As a result of said conspir-
11 acy so existing at the time these purchases were made from said
12 defendants, and each of them, plaintiff BRONSON and the State of
13 California and any other State of the United States have suffered
14 damage and injury in their property in actual amounts to be demon-
15 strated at trial, and are entitled under Section 4 of the said
16 Sherman Anti-Trust Act, Title 15, United States Code Annotated,
17 Section 15, to threefold damages to be demonstrated at trial, and
18 as incorporated herein under DAMAGES from page 274.

19 XII

20 WHEREFORE, plaintiff demands judgment against the defendants,
21 and each of them, the sum and costs which shall be demonstrated
22 at trial and treble damages, together with reasonable counsel
23 fee, besides the costs and disbursements of this action; that a
24 temporary restraining order and preliminary injunction may be is-
25 sued out of this court upon its order directing the defendants,
26 and each of them, and their agents, servants and employees, from
27 in any manner interfering with the plaintiff in firearms and re-
28 lated technologies, and that after a trial of this cause that
29 said injunction may be made perpetual; that a decree issue from
30 the court that the contracts between defendant(s) which tended
31 to create a wrongful monopoly in the firearms and related tech-
32 nologies industries in the States of California, Connecticut and

1 Delaware, in particular, and elsewhere, are void, and that all
2 contracts wrongfully entered into between defendants, and each
3 of them, are void.

4 XIII

5 WHEREFORE, plaintiff demands, pursuant to 15 U.S.C., Sec. 1
6 et seq., and Sec. 26, the following:

7 1. That a temporary restraining order and preliminary injunc-
8 tion may be issued out of this Court upon its order directing the
9 defendants, and each of them, and their agents, servants and em-
10 ployees, from in any manner interfering with plaintiff in the
11 firearms and related industries, and that after a trial of this
12 cause that said injunction may be made perpetual;

13 2. For a decree of this Court that the contracts between
14 said defendants, and each of them, which tend to create a mono-
15 poly of the firearms and related industries are void, and that
16 all contracts entered into between defendants, and each of them,
17 and others, whereby users of plaintiff's firearms and related
18 technologies would be forced into not doing business with plain-
19 tiff are void, defendants being the only source of business;

20 3. For a decree ascertaining the damages suffered by plain-
21 tiff by reason of the unlawful acts of the defendants herein com-
22 plained of, and awarding judgment in favor of the plaintiff and
23 against the defendants, and each of them, for thrice the amount
24 of said damages, costs, and a reasonable attorney's fee;

25 4. That a decree issue from the Court that the contracts
26 between defendant(s) which tended to create a wrongful monopoly
27 in the firearms and related technologies industries in the States
28 of California, Connecticut and Delaware, in particular, and else-
29 where, are void, and that all contracts wrongfully entered into
30 between defendant(s) are void.

31 Ronald Reagan-3015

SEVENTY-FOURTH CAUSE OF ACTION

I

Plaintiff brings this civil action seeking treble damages and injunctive relief for injuries and threatened and continuing injuries to his business, property and trade caused by defendants' monopolistic practices, unreasonable conspiracies and restraints of trade and other violations of the Sherman and Clayton Acts for jurisdiction of this Court under 15 USC §§15,26,1,2,13,18; and 28 USC §1337.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth herein, hereinafter and hereinbefore complained of for interference with interstate commerce and competition.

III

Plaintiff GEORGE A BRONSON is President of Anchor International, Inc., a California corporation, having its principal place of business in Sacramento, California. Plaintiff is a Yale graduate Inventor and Patent Holder of Record in the United States, NATO and other allied countries. Plaintiff is the Inventor and Patent Holder of United States Patent No. 3,543,428, author and owner of proprietary, new, efficient lifesaving technologies selectively published in "ANCHOR INTERNATIONAL WEAPONS TRAINING FIRING MANUAL AND BRONSON STRINGFIRE METHOD".

IV

Defendants are found and transact business in States of Maryland, Virginia, Delaware, New York, California, Washington, D.C., Connecticut, and elsewhere. Ronald Reagan-3016

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

Defendants are:

1. Def. UNITED STATES ARMY, headquarters The Pentagon, Washington, D.C., for the Aberdeen Proving Grounds, Aberdeen, Maryland, and elsewhere.

2. Def. WINCHESTER-WESTERN DIVISION of the OLIN CORPORATION, Stamford, Connecticut.

3. Def. REMINGTON ARMS DIVISION of the DUPONT DE NEMOURS CORPORATION, Wilmington, Delaware.

4. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTORS L.P. GRAY, WILLIAM RUCKELSHAUS, CLARENCE M. KELLEY, headquarters Washington, D.C.

5. Def. NATIONAL RIFLE ASSOCIATION of AMERICA, 1600 Rhode Island Avenue, N.W., Washington, D.C.

6. Def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION of the UNITED STATES DEPARTMENT OF JUSTICE, headquarters Washington, D.C.

7. Def. INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, INC., headquarters 11 Firstfield Road, Gaithersburg, Maryland.

8. Def. NATIONAL SHERIFFS ASSOCIATION, 1250 Connecticut Avenue, N.W., Washington, D.C., headquarters.

9. Defs. NIXON ADMINISTRATION WHITE HOUSE OFFICIALS, 1600 Pennsylvania Avenue, Washington, D.C.

10. Def. COLT INDUSTRIES, INC., headquarters New York City.

11. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER and GOVERNOR RONALD REAGAN, State Capitol, Sacramento, CA.

12. Def. LOS ANGELES CITY AND COUNTY, SHERIFF PETER PITCHESS, LOS ANGELES POLICE CHIEF EDWARD DAVIS, Los Angeles, California.

13. Def. SACRAMENTO COUNTY, SHERIFF DUANE LOWE, DISTRICT ATTORNEY JOHN PRICE, 720 - 9th Street, Sacramento, California.

14. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE, CHIEF WILLIAM J. KINNEY,

Ronald Reagan-3017

ORIGINAL

1 15. Def. FEDERAL PROTECTIVE SERVICE, OFFICERS CHASTAINE,
2 CLEMONS and SNELSON, Sacramento, California.

3 16. Def. STATE OF CALIFORNIA, CALIFORNIA HIGHWAY PATROL,
4 COMMISSIONER GLENDON B. CRAIG, headquarters Sacramento, California.

5 17. Def. STATE OF CALIFORNIA, STATE POLICE, OFFICERS WESTON
6 and SHERWOOD, CHIEF GUY R. OATES, headquarters Sacramento, CA.

7 18. Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr.,
8 MARC POCHE, State Capitol, Sacramento, California.

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1 VI

2 Plaintiff was to have been engaged in the business of fire-
3 arms and related technologies from 1971 forward. Defendant(s)
4 stopped plaintiff from engaging in this business in interstate
5 commerce between the various states and developing and expanding
6 plaintiff's business, details more fully set forth as follows.

7 VII

8 Plaintiff had developed a potentially large and profitable
9 business among its customers, to wit, sports shooting, law enforce-
10 ment, related technologies, in the markets of various states of the
11 United States, and plaintiff was about to enjoy a lucrative and
12 profitable business and increase its profits and prosper accord-
13 ingly.

14 VIII

15 Defendant(s) combined and organized in an association con-
16 sisting of federal, state, county and city government officials,
17 agents, employees or servants, firearms manufacturers, public util-
18 ities, and members of the weapons training industry, and consis-
19 ted of individuals, firms, and corporations engaged in military,
20 law enforcement and sport shooting activities and supportive ser-
21 vices, with its membership composed of those defendant(s) parti-
22 cipating and acting in federal funding blackmail to suppress plain-
23 tiff and plaintiff's technologies.

24 Ronald Reagan-3019
IX

25 All of the defendants herein violated the provisions of the
26 act of Congress passed July 2, 1890, entitled "An Act to protect
27 trade and commerce against unlawful restraints and monopolies,"
28 in that they are engaged in a combination and conspiracy to place
29 unlawful restraints upon the trade and commerce in firearms, re-
30 lated technologies, lawenforcement, military and NATO weapons
31 training technologies between the several states and territories
32 of the United States and between the United States and the

1 Dominion of Canada.

2 X

3 The combination and conspiracy herein complained of have
4 been in continuous existence since about 1971 and have been par-
5 ticipated in for varying periods and in varying degrees by each
6 of the defendants herein named, and also by a large number of in-
7 dividuals not named as defendants herein. The initial step in
8 furtherance of the conspiracy was the organization of illegal
9 campaign contributions to the NIXON ADMINISTRATION to suppress
10 plaintiff's technology from use within the federal government,
11 followed by use of the LAW ENFORCEMENT ASSISTANCE ADMINISTRATION,
12 and others, for funnelling federal funds to defendant(s) in feder-
13 al funding blackmail and payoff and bribe for not implementing
14 plaintiff's technologies.

15 XI

16 From the time of the organization of the voluntary associa-
17 tion hereinbefore described, in 1971, to the time of the filing
18 of this petition, various measures were adopted by the voluntary
19 association and by the successive officers, directors, officials,
20 agents, employees or servants, of the association, in furtherance
21 of the combination and conspiracy hereinbefore alleged. Among
22 such measures are the following:

23 1. Beating, strangulation, handcuffing, false imprisonment,
24 etc., of plaintiff, August 22, 1975.

25 2. Assaults and threats of plaintiff while being stalked,
26 "dogged", followed, from 1971 to present.

27 3. Illegal wiretapping on or about 1971 to present.

28 4. Electronic disruption of plaintiff's business telephone
29 communications by illegal wiretap, and other warrantless search.

30 5. Threatening plaintiff with deadly weapons, including
31 drawn pistols, rifles and shotguns, government automobiles and
32 planes, as well as fists.

Ronald Reagan-3020

1 XII

2 As a result of the combination and conspiracy hereinbefore
3 alleged and of the various acts done in pursuance thereof by de-
4 fendants herein and others, as above alleged, the power and influ-
5 ence of the defendant(s), and each of them, has been greatly in-
6 creased, its membership grown.

7 XIII

8 As a further and direct result of said combination and con-
9 spiracy, interstate trade and commerce in firearms and related
10 technologies is restrained and prevented in such a manner and to
11 such an extent that plaintiff is not allowed to conduct his busi-
12 ness with any one in the industry, even other than defendant(s).

13 XIV

14 The aforesaid acts, and acts incorporated herein from all of
15 plaintiff's CAUSES OF ACTION herein, hereinafter and hereinbefore
16 complained of, on the part of the defendants were in restraint of
17 trade and did constitute a monopoly and were and are an attempt to
18 monopolize, and by reason of plaintiff's loss of customers and
19 legitimate profit, and for other acts forbidden by the anti-trust
20 laws, plaintiff was restricted in its trade and competition with
21 the other members of the firearms and related technologies indus-
22 try, all of which was injurious to this plaintiff and excluded
23 this plaintiff from competition in the trade, and because of such
24 inability to compete in the market during the period herein men-
25 tioned, by reason of the foregoing, it has been damaged in that
26 its property has been lost, its business rendered unprofitable,
27 and the profits of its trade have yet to materialize.

Ronald Reagan-3021

28 XV

29 WHEREFORE, plaintiff demands judgment against the defendants,
30 and each of them, for the sum to be proved at trial, and for treb-
31 le damages, together with reasonable counsel fee, besides the
32 costs and disbursements of this action, that a tempor-

1
2 any restraining order and preliminary injunction may be issued
3 out of this Court upon its order directing the defendants, and
4 each of them, and their agents, servants and employees, from in
5 any manner interfering with the plaintiff in firearms and related
6 technologies, and that after a trial of this cause that said
7 injunction may be made perpetual; that a decree issue from the
8 Court that the contracts between defendant(s) which tended to
9 create a wrongful monopoly in the firearms and related technolo-
10 gies industries in the States of California, Connecticut and
11 Delaware, in particular, are void, and that all contracts wrong-
12 fully entered into between defendant(s) are void.
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30 Ronald Reagan-3022
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SEVENTY-FIFTH CAUSE OF ACTION

I

Plaintiff brings this civil action seeking treble damages and injunctive relief for injuries and threatened and continuing injuries to his business, property and trade caused by defendants' monopolistic practices, unreasonable conspiracies and restraints of trade and other violations of the Sherman and Clayton Acts for jurisdiction of this Court under 15 USC §§15,26,1,2,13,18; and 28 USC §1337.

II

Plaintiff does hereby incorporate and adopt by reference, all allegations set forth herein, hereinafter and hereinbefore complained of for interference with interstate commerce and competition.

III

Plaintiff GEORGE A BRONSON is President of Anchor International, Inc., a California corporation, having its principal place of business in Sacramento, California. Plaintiff is a Yale graduate Inventor and Patent Holder of Record in the United States, NATO and other allied countries. Plaintiff is the Inventor and Patent Holder of United States Patent No. 3,543,428, author and owner of proprietary, new, efficient lifesaving technologies selectively published in "ANCHOR INTERNATIONAL WEAPONS TRAINING FIRING MANUAL AND BRONSON STRINGFIRE METHOD".

IV

Defendants are found and transact business in States of Maryland, Virginia, Delaware, New York, California, Washington, D.C., Connecticut, and elsewhere. Ronald Reagan-3023

V

Plaintiff does not know the true names and capacities of defendants sued herein as JOHN DOES ONE THROUGH ONE HUNDRED, and therefore sues these defendants, and each of them, by such fictitious names for damages caused and proximately caused to plaintiff.

V

Defendants are:

1. Def. UNITED STATES ARMY, headquarters The Pentagon, Washington, D.C., for the Aberdeen Proving Grounds, Aberdeen, Maryland, and elsewhere.

2. Def. WINCHESTER-WESTERN DIVISION of the OLIN CORPORATION, Stamford, Connecticut.

3. Def. REMINGTON ARMS DIVISION of the DUPONT DE NEMOURS CORPORATION, Wilmington, Delaware.

4. Def. FEDERAL BUREAU OF INVESTIGATION, DIRECTORS L.P. GRAY, WILLIAM RUCKELSHAUS, CLARENCE M. KELLEY, headquarters Washington, D.C.

5. Def. NATIONAL RIFLE ASSOCIATION of AMERICA, 1600 Rhode Island Avenue, N.W., Washington, D.C.

6. Def. LAW ENFORCEMENT ASSISTANCE ADMINISTRATION of the UNITED STATES DEPARTMENT OF JUSTICE, headquarters Washington, D.C.

7. Def. INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE, INC., headquarters 11 Firstfield Road, Gaithersburg, Maryland.

8. Def. NATIONAL SHERIFFS ASSOCIATION, 1250 Connecticut Avenue, N.W., Washington, D.C., headquarters.

9. Defs. NIXON ADMINISTRATION WHITE HOUSE OFFICIALS, 1600 Pennsylvania Avenue, Washington, D.C.

10. Def. COLT INDUSTRIES, INC., headquarters New York City.

11. Def. STATE OF CALIFORNIA, ATTORNEY GENERAL EVELLE J. YOUNGER and GOVERNOR RONALD REAGAN, State Capitol, Sacramento, CA.

12. Def. LOS ANGELES CITY AND COUNTY, SHERIFF PETER PITCHESS, LOS ANGELES POLICE CHIEF EDWARD DAVIS, Los Angeles, California.

13. Def. SACRAMENTO COUNTY, SHERIFF DUANE LOWE, DISTRICT ATTORNEY JOHN PRICE, 720 - 9th Street, Sacramento, California.

14. Def. CITY OF SACRAMENTO, SACRAMENTO POLICE, CHIEF WILLIAM J. KINNEY,

Ronald Reagan-3024

ORIGINAL

1 15. Def. FEDERAL PROTECTIVE SERVICE, OFFICERS CHASTAINE,
2 CLEMONS and SNELSON, Sacramento, California.

3 16. Def. STATE OF CALIFORNIA, CALIFORNIA HIGHWAY PATROL,
4 COMMISSIONER GLENDON B. CRAIG, headquarters Sacramento, California.

5 17. Def. STATE OF CALIFORNIA, STATE POLICE, OFFICERS WESTON
6 and SHERWOOD, CHIEF GUY R. OATES, headquarters Sacramento, CA.

7 18. Def. STATE OF CALIFORNIA, GOVERNOR EDMUND G. BROWN, Jr.,
8 MARC POCHE, State Capitol, Sacramento, California.

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14 VI

15 The acts herein alleged to have done by defendants have re-
16 sulted in the restraining of interstate commerce in Washington,
17 D.C., Quantico, Virginia, Sacramento, California, Los Angeles,
18 California, and elsewhere, and have tended to, and actually creat-
19 ed a monopoly in the line of interstate commerce within these
20 areas and elsewhere; and plaintiff herein has been injured in his
21 business and property by reason of the doing of those acts in vio-
22 lation of the anti-trust laws.

Ronald Reagan-3025

23 VII

24 The predominant manufacturing and sale of firearms and re-
25 lated technologies takes place in the States of Connecticut and
26 Massachusetts. The distribution of firearms and related technolo-
27 gies is accomplished in offices located at various strategic
28 points in the United States, variously known as "gunshops, hard-
29 ware stores", etc. Both the manufacture and distribution of fire-
30 arms and its related technologies involve the transportation of
31 firearms and related technologies in interstate commerce, and in-
32 volve and constitute interstate commerce.

VIII

Normally contracts for firearms manufacture and/or deliveries are called "license agreements", and grant to the licensee the right to manufacture and/or sell under "license agreement" said firearm(s) "line". The "license agreement" provides for the manufacture and/or delivery of the firearm(s) "line" to the licensee-distributor-retailer. "License agreements" are normally made for one year, renewable, are in writing, and in each instance signed by the manufacturer or his representative and licensee under the terms thereof. These license agreements provide for the compensation which shall be paid to the licensee, which may be a fixed amount or a percentage or some other arrangement. The manufacturer or his representative normally solicits from the licensee the license agreement.

IX

Defendants WINCHESTER WESTERN/OLIN and REMINGTON ARMS/DUPONT are substantial and dominant manufacturers of rifles and shotguns. Defendant COLT is a substantial and dominant manufacturer of pistols, and the prime contractor and manufacturer of the U.S. ARMY infantry rifle, the M-16. There are smaller manufacturers and sellers of firearms, many of whom manufacture under sub-contracts to defendants WINCHESTER, REMINGTON, COLT, and others.

X

Defendants control the release and distribution of each of his "line" of firearms, and it is impossible to successfully operate a "gun shop, hardware store, sporting goods store", etc., particularly in a city like Sacramento, without obtaining at least one of the defendant's firearms "line".

Ronald Reagan-3026

XI

From 1968 forward, plaintiff organized a California corporation, and after being granted United States Patent No. 3,543,428, "Rifle Forestock", proceeded to develop lists of clients, fire-

1 arms manufacturers, and retail dealers, with whom to license the
2 manufacturing and/or sale of plaintiff BRONSON's newly patented
3 technology, and plaintiff invested sums to that end.

4 XII

5 The defendants, well knowing each and all of the above facts,
6 thereby entered into a conspiracy with each other to prevent plain-
7 tiff's "rifle forestock" and related technologies from being suc-
8 cessfully licensed, manufactured, sold or used, and to destroy
9 the entire value of plaintiff's "rifle forestock" patent and re-
10 lated technologies, and to destroy plaintiff's investment, and to
11 force plaintiff to lose his benefits from grant of seventeen (17)
12 years of patent protection, by preventing plaintiff or any other
13 person desiring to "license" with plaintiff from having access to
14 defendants' "lines" of firearms, distributed by them in interstate
15 commerce, here described, so that for want or lack of such "lines",
16 any user/licensee of plaintiff's firearms technologies and "rifle
17 forestock" would be compelled to sell his and plaintiff's business
18 at a sacrifice and great loss.

19 Ronald Reagan-3027

20 XIII

21 To that end, and for that purpose, the defendants connived
22 and conspired with each other to do and make, and pursuant to the
23 conspiracy did and made, the following acts and contracts, all of
24 which were done and made for the purpose of preventing the plain-
25 tiff or any one else from license, manufacture or sale of plain-
26 tiff's "rifle forestock" and related technologies, and thereby
27 destroying plaintiff's and any one else's business. Among the
28 things defendants did are the following:

29 1. Defendants negotiated, and caused to be negotiated, for
30 the year beginning 1971 to present, contracts with defendant U.S.
31 ARMY to coverup the inferior, inefficient, ineffective M-16 infan-
32 try rifle.

32 2. Defendants negotiated, and caused to be negotiated, for

1 the year beginning 1971 to present, illegal campaign contributions
2 to the NIXON ADMINISTRATION to make it impossible for plaintiff
3 to license or in any way conduct business with the UNITED STATES
4 GOVERNMENT AND any agency thereof.

5 3. Defendants negotiated, and caused to be effected under
6 threat of losing a "line" of firearms, suppression and nonlicen-
7 sing of plaintiff's technologies from among retail dealers.

8 4. Defendants negotiated, and caused to be effected, from
9 political or funding blackmail acts, state, county and city govern-
10 ments' suppression and nonimplementation of plaintiff's new life-
11 saving firearms technologies.

12 5. Defendants negotiated, and caused to be effected, the
13 libel, slander and discrediting of plaintiff in his professional
14 reputation in the firearms industry and elsewhere.

15 6. Defendants negotiated, and caused to be effected, the
16 assault, batter, handcuffing, strangulation, false imprisonment,
17 false arrest, illegal search and seizure, etc., of plaintiff as
18 herein, hereinafter, and hereinbefore complained of.

19 7. Defendants negotiated, and caused to be effected, the
20 illegal and warrantless wiretapping of plaintiff, and the defen-
21 dant FBI disconnection of and disrupting plaintiff's business
22 telephone communications, particularly within the firearms indus-
23 try.

Ronald Reagan-3028

24 XIV

25 Each and all of those acts were conceived and carried out
26 with the sole purpose of preventing any person from license agree-
27 ments with plaintiff by threatening the loss of firearms "lines",
28 so that no potential licensee would want to deal or enter into
29 license with plaintiff and thereby destroy plaintiff's business.

30 XV

31 These acts and conspiracy on the part of the defendants were
32 successful, and as a result thereof, plaintiff was not able to

1 obtain sufficient interest to license successfully, and was not
2 able to license as plaintiff otherwise would, and could have, and
3 plaintiff became and was financially embarrassed and scaled-down
4 the operation of his business.

5 XVI

6 Each and every one of the acts of the defendants hereinbe-
7 fore alleged, were each and all intended to be by the defendants,
8 and were conceived and carried out for that purpose, and were in
9 restraint of trade and commerce among the states in the United
10 States, and constituted, and were intended by them, and were in
11 effect, a combination and conspiracy in restraint of trade and
12 commerce among the several states, in that they were intended to
13 and did prevent the plaintiff and any person from entering into
14 contracts or licensing agreements for firearms and related tech-
15 nologies; and each and every one of said acts were in violation
16 of said Sherman Anti-trust Act and the Clayton Anti-trust Act,
17 and do and did create and produce and constituted a monopoly,
18 and were intended to, and had the effect of an attempt to, monop-
19 olize the distribution, manufacture, sale and license of firearms
20 and related technologies in the United States, all of which was
21 and is injurious to plaintiff, and prevented plaintiff from either
22 using his "rifle forestock" and related technologies, or licensing
23 the same, as plaintiff could and would have done, except because
24 of said conspiracy; and because of the inability to compete in
25 the market by reason of the foregoing, the said acts and each of
26 them did prevent the free flow of "rifle forestocks" and related
27 technologies in commerce among the several states.

Ronald Reagan-3029

28 XVII

29 As a result of said combination, conspiracy, and various acts
30 done in pursuance thereof, as hereinbefore and hereinafter alleged,
31 by the defendants therein, it did become impossible to manufacture,
32 sell or license plaintiff's "rifle forestock" and related tech-

1 nologies successfully; and the years since issuance of patent,
2 U.S. Patent No. 3,543,428, "Rifle Forestock", was wholly destroyed,
3 and the value of plaintiff's investment in said "rifle forestock"
4 and related technologies was wholly destroyed, and plaintiff has
5 been damaged in amounts to be proved at trial, and as incorporated
6 herein under DAMAGES from page 274.

7 XVIII

8 WHEREFORE, plaintiff prays judgment against the defendants,
9 and against each of them, for damage and sums to be proved at
10 trial, for treble damages, as provided by said Clayton Amendment
11 to said Sherman Anti-trust Act, together with a reasonable coun-
12 sel fee, and besides the costs and disbursements of this action;
13 that a temporary restraining order and preliminary injunction may
14 be issued out of this Court upon its order directing the defen-
15 dants, and each of them, and their agents, servants and employees,
16 from in any manner interfering with the plaintiff in firearms
17 and related technologies, and that after a trial of this cause
18 that said injunction may be made perpetual; that a decree issue
19 from the Court that the conspiracies and contracts between de-
20 fendant(s) which tended to create a wrongful monopoly in the
21 firearms and related technologies industries in the States of
22 California, Connecticut, and Delaware, in particular, and else-
23 where, are null and void, and that all conspiracies and contracts
24 wrongfully entered into between defendants, and each of them,
25 are null and void.

Ronald Reagan-3030

26 * * * * *

27 Defendants, and each of them, in plaintiff BRONSON's FIRST
28 through SEVENTY-FIFTH CAUSES OF ACTION and incorporated herein,
29 wrongfully exceeded their scope of employment and did not use
30 due care toward plaintiff. Defendants, and each of them, at all
31 times operated "within the authority of employment" and, therefore,
32 in one sense operated "within scope of employment" but at the

Ronald Reagan-3031

1 same time wrongfully exceeded and wrongfully abused the legal
2 scope of employment which the Court is asked to note.

3 At no time can officials, federal, state or other, act ille-
4 gally and damaging to others and legally and genuinely be "within
5 the scope of employment"; however, from the days of John Edgar
6 Hoover and the FBI's origination of this "scope of employment"
7 idea to protect FBI agents, the public at large is stuck with a
8 double entendre in legal phraseology and the Court is asked to
9 most carefully differentiate between being on the job "8 hours
10 a day" and operating legally and honestly in that same "8 hours
11 a day".

12 From the days of the Watergate scandals, of which this case
13 is an aftermath, various federal officials tried to evade the
14 responsibility of the law by this "within the scope of employ-
15 ment" idea. On the one hand they tried to say that federal
16 agencies and higher officials and the United States itself were
17 not liable, that only the individual can be sued for not operating
18 within the scope of employment.

19 Rephrased, American Constitutional Justice is a fraud if
20 federal, state and county officials can operate illegally, wrong-
21 fully and against American Justice, damaging citizens, and claim
22 they operate within the scope of employment. The True Law is
23 that when an official or agency performs or functions in a compe-
24 tent lawful manner with due care, under the law, then they have
25 some substance to stating that they are doing Government's good
26 work by law and therefore are not prosecutable.

27 But as soon as they become corrupt, damaging, extra legal,
28 conspiratorial, outside and exceeding the law, they are not
29 immune from prosecution and statutes so state, and plaintiff so
30 charges the defendants named herein, and each of them, and others,
31 with fraud, corruption, malice, and conspiracy and acts in viola-
32 tion of Federal Law and Constitution.

1 * * * * *

2 WHEREFORE, Plaintiff GEORGE A. BRONSON demands judgment
3 against defendants, and each of them, the sum and costs of which
4 shall be proved at trial, and for damages, treble damages, com-
5 pensatory and punitive damages, injunctions, permanent injunc-
6 tions, and temporary restraining orders, and for such other
7 relief as is deemed just and proper by this Court.

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DAMAGES

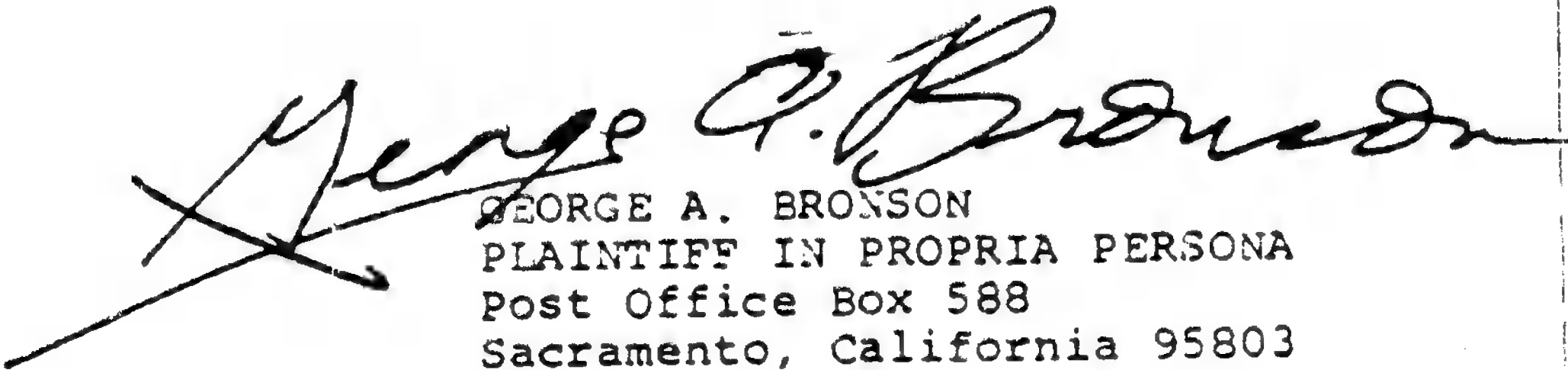
WHEREFORE, plaintiff prays for a joint and several judgment against defendants, and each of them, for all causes of action herein complained of, as follows:

1. For general damages in the sum of FORTY SEVEN MILLION DOLLARS (\$47,000,000.00);
2. For medical and allied expenses and impairment of earning capacity according to proof;
3. For punitive damages in the sum of THIRTY MILLION DOLLARS (\$30,000,000.00);
4. For costs of litigation incurred herein; and
5. For such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

The plaintiff in the herein entitled civil action requests a trial by jury as guaranteed by the Seventh Amendment to the Constitution of the United States and as provided by Federal Rules of Civil Procedure, Rule 38.

EXECUTED: May 10, 1978, at Sacramento, California.


GEORGE A. BRONSON
PLAINTIFF IN PROPRIA PERSONA
Post Office Box 588
Sacramento, California 95803

Ronald Reagan-3033

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6/12/78

TO: DIRECTOR, FBI
ATTN: OFFICE OF LEGAL COUNSEL

FROM: SAC, SACRAMENTO (197-5) (P)

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED

SUBJECT: GEORGE A. BRONSON

DATE 5/8/92 BY SSA9803RDVA
405,193

vs. THE UNITED STATES OF AMERICA;
GOVERNOR EDMUND G. BROWN, JR.;
FEDERAL BUREAU OF INVESTIGATION AND
DIRECTORS L.P. GRAY, CLARENCE KELLEY,
WILLIAM RUECKELHAUS; U.S. DEPT. OF
JUSTICE, U.S. ATTORNEYS DWAYNE KEYES,
DONALD HELLER; U.S. TREASURY DEPT.,
SECRET SERVICE; FEDERAL PROTECTIVE
SERVICE/GSA, DIRECTOR, OFFICERS CLEMONS
(BADGE 3327), JAMES CHASTAINE, CLARENCE
L. SNELSON; LUV SECURITY SERVICE, OFFICERS
GREER AND W.W. SMITH; LEON JAWORSKI;
GEN. ALEXANDER HAIG; STATE OF CALIFORNIA,
ATTORNEY GENERAL EVELLE J. YOUNGER,
STATE CONTROLLER HOUSTON I. FLOURNOY,
MARC POCHE, CALIFORNIA HIGHWAY PATROL,
COMMISSIONER GLENDON B. CRAIG, STATE
POLICE, CHIEF GUY R. OATES, OFFICERS
L.D. SHERWOOD AND S.W. WESTON, RONALD REAGAN;
LAW ENFORCEMENT ASSISTANCE ADMIN., U.S. ARMY;
WINCHESTER/OLIN CORP., REMINGTON/DUPONT CO.;
COLT INDUS.; SACRAMENTO COUNTY, SHERIFF
DUANE LOWE, D.A. JOHN PRICE; CITY OF SACRAMENTO,
POLICE DEPT. CHIEF W.J. MINNEY; NRA; IACP;
NAT'L SHERIFF'S ASSN; AT&T, PACIFIC TELEPHONE;
WESTERN UNION; SMUD; L.A. COUNTY, SHERIFF
PITCHESS; CITY OF L.A., MAYOR T. BRADLEY,
CHIEF ED. DAVIS; and JOHN DOES ONE THROUGH
ONE HUNDRED
EDC; SACRAMENTO, CA.
CIVIL ACTION NO. S-76-1117
CIVIL ACTION
OO: SC

3 - Bureau
2 - New Orleans (Enc. 1) (ATTN: SA THOMAS RAY)
2 - Seattle (Enc. 1) (ATTN: SAC JOHN M. REED)
2 - Sacramento
MJM:slm
(9) Ronald Reagan-3035

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SEARCHED	INDEXED
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Ronald Reagan-3038

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FILED

JUN 26 1978

CLERK, U. S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

BY _____ DEPUTY CLERK

HERMAN SILLAS
United States Attorney

JAMES S. JOINER
Assistant U. S. Attorney

2058 Federal Building
650 Capitol Mall
Sacramento, California 95814
Telephone (916) 440-2425

Attorneys for the Defendant
United States of America

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

GEORGE A. BRONSON,)
)
Plaintiff,)
)
v.)
)
THE UNITED STATES OF AMERICA,)
et al.,)
)
Defendants.)

CIVIL NO. S-76-447-PCW

NOTICE OF MOTION AND
MOTION TO DISMISS

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Notice is hereby given that on August 28, 1978
at 10:00 a.m. or as soon thereafter as the matter may be
heard, in Courtroom No. 2 of the United States District Court
for the Eastern District of California, 650 Capitol Mall,
Sacramento, California, defendant The United States of
America, will move the Court to dismiss the above-captioned
Amended Complaint for failure to comply with Rule 8 of the
Federal Rules of Civil Procedure.

MOTION TO DISMISS

The United States of America hereby moves the
Court for an Order dismissing plaintiff's Amended Complaint
in the above-captioned matter for failure to comply with
Rule 8 of the Federal Rules of Civil Procedure.

Ronald Reagan-3039

File Copy

197-5-15

W/AM

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ORIGINAL
FILED

JUL 6 1978

CLERK, U. S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

BY _____ DEPUTY CLERK

HERMAN SILLAS
United States Attorney

JAMES S. JOINER
Assistant U. S. Attorney

2058 Federal Building
650 Capitol Mall
Sacramento, California 95814
Telephone (916) 440-2425

Attorneys for the Defendant
United States of America

UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

GEORGE A. BRONSON,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,
et al.,

Defendants.

FBI
ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 5/8/96 BY SSA9803RDD/DAK
405193

CIVIL NO. S-76-447-PCW

REQUEST FOR AN EXTENSION
OF TIME

Pursuant to F.R.Civ.P. 6(b)(1) it is hereby requested
that the following persons be granted an extension of time
in which to present a responsive filing in the above-cap-
tioned case.

This request is not made by the United States
Attorney's Office in any capacity as attorney of record or
attorney in fact on behalf of the persons listed. Each of
the persons listed has requested representation by the United
States Department of Justice. The Department of Justice
has requested reports on the allegations in plaintiff's
Complaint which, when received, will provide the basis for
a decision concerning representation. The purpose of this
request is solely to enable the Department of Justice
sufficient time to make such a decision. Thus, this request
is not intended to be, nor should be, construed as a waiver

1 of any rights, defenses or jurisdictional requirements.

2 Those persons who are the subject of this request
3 are: Clarence Snelson

4 General Alexander Haig

5 William Ruckleshaus

6 Clarence Kelley

7 L. Patrick Gray

8 Leon Jaworski

9 Dwayne Keyes

10 Donald Heller

11 James Chastaine


12 Leroy Clemons

13 Walter Smith

14 Steven Greer

15 DATE: June 29, 1978

16 HERMAN SILLAS
17 United States Attorney

18 
19 JAMES S. JOINER
20 Assistant U. S. Attorney

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8 UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 GEORGE A. BRONSON,
12 Plaintiff,

13 v.

14 THE UNITED STATES OF AMERICA,
15 et al.,

16 Defendants.
17

FBI
ALL INFORMATION CONTAINED
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DATE 5/8/96 BY SSA9803LPP/KL
405,193

CIVIL NO. S-76-447-PCW

ORDER

18 It is hereby ordered that the following persons
19 may file a response to plaintiff's Amended Complaint on
20 July 31, 1978, or ten (10) days after a decision by the
21 United States Department of Justice concerning representation,
22 whichever date shall come first.

23 General Alexander Haig

Steven Greer

24 William Rucklehaus

Clarence Snelson

25 Clarence Kelley

Walter Smith

26 L. Patrick Gray

Leroy Clemons

27 Leon Jaworski

James Chastaine

28 Dwayne Keyes

Donald Heller

29 Said persons are required to file a response by July 31, 1978
30 or sooner since said date is the final date for filing a
31 motion pursuant to Local Rule of Practice 113(b) to be heard
32

/////

1 on August 28, 1978, the date designated by this Court for
2 hearing various motions by defendants.

3 DATE: JUL 5 1978
4

5 PHILIP C. WILKINS

6 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE BY MAIL

GEORGE A. BRONSON,)
Plaintiff,)
v.) CIVIL NO. S-76-447-PCW
THE UNITED STATES OF)
AMERICA, et al.,)
Defendants.)

The undersigned hereby certifies that she is an employee in the
Office of the United States Attorney for the Eastern District
of California and is a person of such age and discretion
as to be competent to serve papers.

That on July 6, 1978 she served a copy of the attached

REQUEST FOR AN EXTENSION OF TIME - CIVIL NO. S-76-447-PCW
& ORDER

by placing said copy in a postpaid envelope addressed to the person(s)
hereinafter named, at the place(s) and address(es) stated below, which
is/are the last known address(es), and by depositing said envelope and
contents in the United States Mail at Sacramento, California.

Addressee(s):

George A. Bronson
P. O. Box 588
Sacramento, CA 95804

Darryl Doke, Esq.
Deputy Attorney General
State of California
555 Capitol Mall, Suite 350
Sacramento, CA 95814

Westley & Callahan
300 University Avenue
Suite 207
Sacramento, CA 95825

Mike Twibell
J. Edgar Hoover Bldg.
Room 7338
Washington, D. C. 20535

Major Q. Richardson
Army JAG
Office Of The Judge Advocate
General
Washington, D. C.

Mike McCrystle
Federal Bureau of Investigation
2800 Cottage Way
Sacramento, California

Mr. Steven Greer
2257 Hurley Way, Apt. #55
Sacramento, California 95825

Mr. Dwayne Keyes
Suite 134 Connors Bldg.
1100 West Shaw Avenue
Fresno, California 93711

DOJ

Ronald Reagan-3051

Shirley E. Anderson

Addressees - Continued

Mr. Donald Heller
1220 H Street, Suite 201
Sacramento, California 95814

Gibson, Dunn & Crutcher
515 South Flower Street
Los Angeles, California 90071

Mr. Walter W. Smith
7406 Sagemount Way
Citrus Heights, California 95610

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Ronald Reagan-3053

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FILED

AUG 30 1978

CLERK, U. S. DIST. COURT
Eastern District of California

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

GEORGE A. BRONSON,

Plaintiff,

v.

UNITED STATES OF AMERICA,
et al.,

Defendants.

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Civ. No. S-76-447 PCW

MEMORANDUM AND ORDER

The above-entitled action, filed in pro per, consists of a two hundred and ninety-one (291) page "Amended Complaint," alleging 75 causes of action against more than 50 defendants. Plaintiff seeks \$77,000,000 in damages for violation of his civil rights, as well as injunctive relief against alleged antitrust violations. All defendants, by their respective attorneys, have made various motions to dismiss the amended complaint pursuant to Rule 12 of the Federal Rules of Civil Procedure (FRCP), as well as to dismiss for failure to comply with FRCP Rule 8. These motions were heard at the Court's August 28, 1978 calendar.

Although the Rule 12 motions are based on differing grounds for each of the defendants, the asserted Rule 8 violation as a ground for dismissal is a common thread linking all the defendants. After thorough consideration of the pleadings, multitudinous briefs, and oral presentations at the calendar

1 hearing, the Court is of the opinion that the amended complaint
2 must be dismissed for failure to comply with Rule 8. However,
3 the Court will grant plaintiff leave to further amend his
4 complaint, subject to certain legal ground rules more fully
5 detailed below.

6 It would appear from the amended complaint that
7 plaintiff's basic grievance stems from his inability to gain
8 recognition and utilization of his firearm invention by the
9 military or any law enforcement agency. Plaintiff alleges that
10 all the defendants he has sued are engaged in a massive
11 conspiracy to deprive the nation of his invention, and that
12 these defendants have used virtually everything at their
13 disposal (from verbal threats to police pursuit planes) to
14 harass and intimidate plaintiff and cover up their own misdeeds.

15 Plaintiff's basic grievance aside, the amended
16 complaint in its present 291 page form is a gross and excessive
17 abuse of process, so out of harmony with FRCP Rule 8 that a
18 proper examination of its merits or defects is nearly impossible.
19 However, after a laborious reading of the entire document, the
20 Court has been able to note the following:

21 (a) "Cause of Action" numbers 30 to 51 are virtually
22 identical to numbers 1 through 22 (i.e., the former appear to
23 be xerox copies of the latter, with only occasional minor word
24 changes);

25 (b) "Cause of Action" numbers 52 through 60 are com-
26 pletely repetitive, though not exact copies, of earlier causes
27 of action;

28 (c) constant allegations of conspiracy, and the
29 incorporation by reference of every cause of action into every
30 other make it virtually impossible for each individual defen-
31 dant to determine what specific unlawful acts are alleged to
32 have been committed by him so as to properly defend against
plaintiff's action; and

1 (d) the combination of numerous legal theories in a
2 single cause of action (and often pleaded in a vague, con-
3 clusory manner) is confusing and puts an unfair burden upon the
4 defendants to determine which factual allegation applies to
5 which theory.

6 Given this state of the pleadings, plaintiff has
7 clearly failed to comply with the requirements of FRCP Rule
8 8(a) and 8(e) with regard to his amended complaint. The Court
9 will therefore order the amended complaint dismissed. Agnew v.
10 Moody, 330 F.2d 868 (9th Cir. 1964), cert. denied, 379 U.S.
11 867; Corcoran v. Yorty, 347 F.2d 222 (9th Cir. 1965). The
12 Court will, however, grant plaintiff leave to file a Second
13 Amended Complaint within 60 days, and to serve the new complaint
14 upon all named defendants.

15 To insure, as much as possible, plaintiff's compli-
16 ance with the Federal Rules of Civil Procedure, the Court will
17 take the following actions in the remainder of this Memorandum
18 and Order:

19 A. Eliminate certain portions of the instant amended
20 complaint with prejudice, those portions containing defects
21 not curable by amendment. Plaintiff's suit is over with regard
22 to such claims and parties dismissed with prejudice, and any
23 new complaint plaintiff files in this action should refrain
24 from their mention; and

25 B. Provide plaintiff with a set of legal ground
26 rules to follow in the drafting of his new complaint. Failure
27 to observe these rules may subject plaintiff to Orders striking
28 portions of the new complaint or dismissing the entire action
29 with prejudice.

30 IT IS THEREFORE ORDERED that the motions of all
31 defendants to dismiss the amended complaint, filed May 12, 1978,
32 for failure to comply with FRCP Rule 8 be, and the same hereby
are, granted.

1 IT IS FURTHER ORDERED that plaintiff shall have
2 60 days to file and serve (through the Marshal's office) a
3 "Second Amended Complaint" that conforms to Rule 8 and to the
4 ground rules laid out in this Memorandum and Order.

5 IT IS FURTHER ORDERED that plaintiff's FRCP Rule 5
6 motion, presently set for October 10, 1978, be vacated as
7 premature.

8 A. Dismissals with prejudice:

9 1. Plaintiff's instant amended complaint does
10 not, nor could it be amended to, state a class-based invidiously
11 discriminatory animus. Such an allegation is required to state
12 a cause of action under 42 U.S.C. §1985. Griffin v. Brecken-
13 ridge, 91 S.Ct. 1790 (1971). Therefore, any claim based upon
14 §1985 is hereby dismissed with prejudice, pursuant to FRCP
15 12(b)(6). Because of a failure to establish any §1985 right,
16 the interrelated, dependent §1986 claim is also hereby dis-
17 missed with prejudice. Dowsey v. Wilkins, 467 F.2d 1022, 1026
18 (5th Cir. 1972).

19 2. Plaintiff's instant amended complaint does
20 not, nor could it be amended to, state a racial basis behind
21 any alleged discrimination. Such an allegation is required to
22 state a cause of action under 42 U.S.C. §1981. Arnold v.
23 Tiffany, 359 F.Supp. 1034 (C.D. Cal. 1973), aff'd., 487 F.2d
24 216, cert. denied, 415 U.S. 984; Gradillas v. Hughes Aircraft
25 Co., 407 F.Supp. 865, 867 (D.Ariz. 1975). Therefore, any
26 claim based upon §1981 is hereby dismissed with prejudice,
27 pursuant to FRCP 12(b)(6).

28 3. The applicable statute of limitations to
29 federal civil rights actions is the three year period of
30 California Code of Civil Procedure §338(1) ("action upon a
31 liability created by statute"). Smith v. Cremins, 308 F.2d
32 187 (9th Cir. 1962). The only act which defendant Western
Union is accused of participating in occurred on April 28, 1973

1 (see, amended complaint, pp.76, 183, 226). Since the original
2 complaint was filed in this Court on August 20, 1976, after
3 the running of the applicable 3 year statute of limitations,
4 the action must be, and hereby is, dismissed with prejudice as
5 to defendant Western Union.

6 4. In light of this applicable 3 year statute
7 of limitations, all civil rights allegations in this action
8 occurring prior to August 20, 1973 are hereby dismissed with
9 prejudice.

10 IT IS SO ORDERED.

11 B. Legal ground rules:

12 1. Any new complaint must satisfy FRCP Rules
13 8(a) and 8(e). Plaintiff is also directed to take note of the
14 pleading-drafting language of Rules 12(e) and 12(f).

15 2. Any new complaint must state its claims with
16 factual specificity and not in a conclusory fashion. See,
17 Finley v. Rittenhouse, 415 F.2d 1186 (9th Cir. 1969).

18 3. Any allegations of conspiracy must include
19 the overt act done in furtherance thereof. Sykes v. State of
20 California, 497 F.2d 197, 200 (9th Cir. 1974).

21 4. Any new complaint must omit all "John Doe"
22 defendants. Tolefree v. Ritz, 382 F.2d 566, 567 (9th Cir.
23 1967).

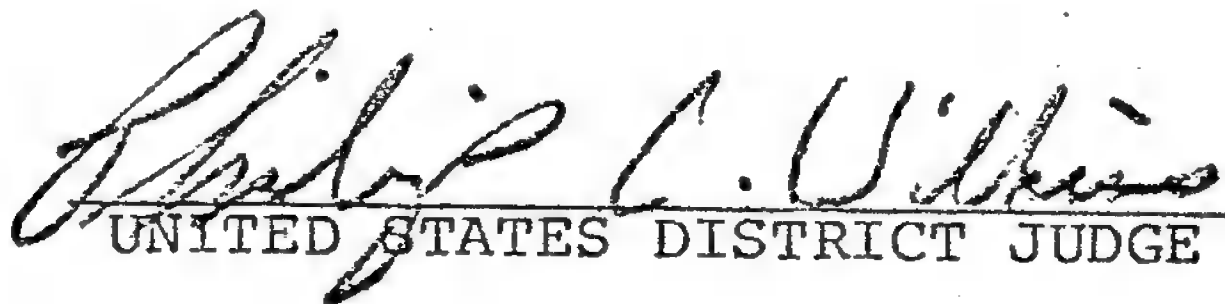
24 5. Plaintiff should supply affidavits under
25 penalty of perjury, if he can, showing specific contacts of
26 non-resident defendants in the State of California so as to
27 support personal jurisdiction over these defendants. (Such
28 defendants include Alexander Haig, William Ruckelshaus, Leon
29 Jaworski, L. Patrick Gray, and Clarence Kelley; also Colt
30 Industries Inc., National Sheriffs' Association, and I.A.C.P.)
31 This Court is not bound by plaintiff's pleadings in determining
32 personal jurisdiction; rather, the party asserting jurisdiction
has the burden of establishing it if his allegations are

1 challenged in an appropriate manner (as they are here by
2 affidavits of certain defendants). Taylor v. Portland Para-
3 mount Corporation, 383 F.2d 634, 639 (9th Cir. 1967); Uston v.
4 Grand Resorts, Inc., 564 F.2d 1217 (9th Cir. 1977). In regard
5 to the above listed non-resident individual federal defendants
6 plaintiff should demonstrate, if he can, forum-related acts
7 personally committed by each individual. See, Kipperman v.
8 McCone, 422 F.Supp. 860, 873 (N.D. Cal. 1976). Failure to
9 establish personal jurisdiction over any non-resident defendant
10 will subject plaintiff's action to a dismissal with prejudice
11 with respect to such defendant.

12 6. Any proper civil motions related to this
13 action must be noticed pursuant to Local Rule 113(b) and (e),
14 and not merely requested in the body of a points and authorities
15 memorandum.

16 IT IS SO ORDERED.

17 DATED: August 29, 1978.

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19 UNITED STATES DISTRICT JUDGE
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HERMAN SILLAS
United States Attorney

JAMES S. JOINER
Assistant U. S. Attorney

CLERK, U. S. DIST. COURT
Eastern District of California

2058 Federal Building
650 Capitol Mall
Sacramento, California 95814
Telephone (916) 440-2425

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Attorneys for the Defendant
United States of America

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

GEORGE A. BRONSON,)
)
Plaintiff,)
)
v.)
)
THE UNITED STATES OF AMERICA,)
et al.,)
)
Defendants.)
)
)

CIVIL NO. S-76-447-PCW

UNITED STATES OF AMERICA'S REPLY TO
BRIEF IN SUPPORT OF MOTION TO DISMISS

I

Plaintiff Cannot Meet Its Burden
of Proving Personal Jurisdiction.

Plaintiff has made brief reference to 28 U.S.C.
§ 1391(e) in support of his contention that the Court has
personal jurisdiction over all defendants in this matter.
While it remains unclear whether plaintiff is individually
suing defendants Haig, Ruckelshaus, Jaworski, Gray and
Kelley, each of these defendants dispute the applicability
of § 1391(e).

In the recent case of Driver v. Helms, __ F.2d __,
(1st Cir. 1978), No. 77-1482, plaintiff sought to apply
§ 1391(e) to former government officials. The court

1 stated very clearly:

2 We do not, however, find any indication
3 in the statute itself or in the legis-
4 lative history that former officials
5 were meant to be included. We are not
6 alone in this conclusion. See Kipperman
7 v. McCone, 422 F. Supp. 860, 876 (N.D.
8 Cal. 1976); Wu v. Keeney, 384 F. Supp.
9 1161, 1168 (D.C. Dist. 1974). (Emphasis
10 added) Id., at 4.

11 As discussed in the United States' opening brief,
12 plaintiff has the burden of establishing jurisdiction.
13 In the present matter, that simply cannot be done.
14 Messrs. Ruckelshaus, Gray, Jaworski and Kelley are former
15 government officials. General Haig was not yet Commander
16 of NATO at the time of the allegedly improper conduct.
17 Thus, the Amended Complaint should be dismissed with
18 respect to defendants Haig, Ruckelshaus, Jaworski, Kelley,
19 and Gray.

20 DATED: August 21, 1978

21 HERMAN SILLAS
22 United States Attorney

23 By _____
24 JAMES S. JOINER
25 Assistant U.S. Attorney

26 Attorneys for the Defendant
27 United States of America

CERTIFICATE OF SERVICE BY MAIL

GEORGE A. BRONSON,)
Plaintiff,)
v.)
UNITED STATES OF AMERICA, et al.,)
Defendants.)

Civil No. S-76-447-PCW

The undersigned hereby certifies that She is an employee in the
Office of the United States Attorney for the Eastern District
of California and is a person of such age and discretion
as to be competent to serve papers.

That on August 21, 1978 She served a copy of the attached

UNITED STATES OF AMERICA'S REPLY TO BRIEF IN
SUPPORT OF MOTION TO DISMISS

by placing said copy in a postpaid envelope addressed to the person(s)
hereinafter named, at the place(s) and address(es) stated below, which
is/are the last known address(es), and by depositing said envelope and
contents in the United States Mail at Sacramento, California.

Addressee(s):

George A. Bronson
P.O. Box 588
Sacramento, CA 95804

Darryl Doke, Esq.
Deputy Attorney General
State of California
555 Capitol Mall, Suite 350
Sacramento, CA 95814

Porter, Scott, Weiberg &
Delehant
300 University Ave., Suite 207
Sacramento, CA

Gibson, Dunn & Crutcher
515 South Flower Street
Los Angeles, CA 90071

Ramsey, Scott & Morrison
800 Ninth Street
Sacramento, CA 95814

Diepenbrock, Wulff, Plant &
Hannegan
455 Capitol Mall, Suite 800
Sacramento, CA 95814

John H. Larson, Co. Counsel
County of Los Angeles
648 Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Bolling, Pothoven, Walter & Gawthrop
555 University Avenue
Sacramento, CA 95825

Vantassell, Fornasero & Vantassell
917 G Street
Sacramento, CA 95814

Burt Pines, City Attorney
1700 City Hall East
200 North Main Street
Los Angeles, CA 90012

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DIANA BERRY

197-5-20
[Handwritten signature/initials over a rectangular stamp]

Ronald Reagan-3064

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JUL 31 1978

CLERK, U. S. DIST. COURT
Eastern District of California

HERMAN SILLAS
United States Attorney

JAMES S. JOINER
Assistant U. S. Attorney

2058 Federal Building
650 Capitol Mall
Sacramento, California 95814
Telephone (916) 440-2425

Attorneys for the Defendant
United States of America

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

GEORGE A. BRONSON,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,
et al.,

Defendants.

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CIVIL NO. S-76-447-PCW

NOTICE OF MOTION
AND MOTION TO DISMISS

NOTICE OF MOTION

TO: PLAINTIFF GEORGE BRONSON:

Notice is hereby given that on August 28, 1978,
at Courtroom Number 2 for the Eastern District of California,
650 Capitol Mall, Sacramento, California defendants Alexander
Haig, William Ruckelshaus, Leon Jaworski, L. Patrick Gray,
Clarence Kelley, Dwayne Keyes, Donald Heller, James Chastain,
Steven Greer, Walter Smith and Clarence Snelson will move
to dismiss the Amended Complaint filed in the above-captioned
case, or such other relief as the Court deems proper.

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/////////

MOTION TO DISMISS

Defendants Alexander Haig, William Ruckelshaus, Leon Jaworski, L. Patrick Gray, Clarence Kelley, Dwayne Keyes, Donald Heller, James Chastain, Steven Greer, Walter Smith, and Clarence Snelson hereby move the United States District Court to dismiss plaintiff's Amended Complaint in the above-captioned case, or such other relief as the Court deems proper on the grounds that said Amended Complaint violates Rules 8(a), 8(c) and 10(b) of the Federal Rules of Civil Procedure, venue does not rest in the Eastern District of California and, the Court does not have in personam jurisdiction over Messrs. Haig, Jaworski, Gray, Ruckelshaus and Kelly. This Motion is based upon the Memorandum of Points and Authorities, and papers attached hereto, and such other reasons as the Court shall deem proper.

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1 MEMORANDUM OF POINTS AND
2 AUTHORITIES IN SUPPORT OF
3 MOTION TO DISMISS

4 INTRODUCTION

5 Plaintiff has served an Amended Complaint upon
6 several defendants, among whom are Alexander Haig, William
7 Ruckelshaus, Clarence Kelley, L. Patrick Gray, Leon Jaworski,
8 Dwayne Keyes, Donald Heller, James Chastain, Clarence
9 Snelson, Walter Smith, and Steven Greer. It is, however,
10 unclear from the Amended Complaint whether each of these
11 defendants have been served in their individual or official
12 capacity. Consequently, each of these defendants has
13 brought the present motion by special appearance, and without
14 waiving the right to assert pleading defects based upon lack
15 of personal jurisdiction, improper venue, insufficiency of
16 process or insufficiency of service of process.

17 I

18 THE AMENDED COMPLAINT DOES NOT
19 COMPLY WITH PLEADING REQUIREMENTS
20 SET FORTH IN THE FEDERAL RULES
21 OF CIVIL PROCEDURE

22 A

23 THE AMENDED COMPLAINT DOES NOT
24 COMPLY WITH F.R.CIV.P. 8

25 The Federal Rules of Civil Procedure require that

26 A pleading which sets forth a claim
27 for relief . . . shall contain . . .
28 a short and plain statement of the
29 claim showing that the pleader is
30 entitled to relief . . . F.R.Civ.P. 8(a).

31 In addition, the Federal Rules require that

32 Each averment of a pleading shall
be simple, concise, and direct.
F.R.Civ.P. 8(e)(1).

These rules have been applied by the Ninth Circuit
on several occasions. In Agnew v. Moody, (9th Cir. 1964)
330 F.2d 868, the court was presented with a fifty-five page
civil rights Complaint, excluding prayer and exhibits. The

1 District Court dismissed the Complaint on the ground that it
2 did not contain ". . . a short and plain statement of the
3 claim". Id., at 870. The Ninth Circuit upheld the lower
4 court's decision with the statement that

5 . . . the district court was entirely
6 justified in holding that the complaint
7 did not comply with Rule 8(a), and in
8 ordering appellant to replead. Id.,
9 at 870.

10 A similar issue was addressed by the Ninth Circuit
11 in Corcoran v. Yorty, (9th Cir. 1965) 347 F.2d 222. In that
12 case, another civil rights action, the court cited Rule
13 8(a) and stated

14 We recently upheld the dismissal of a
15 complaint on this ground where the
16 complaint was no more confusing than
17 that in the present case. (citing
18 Agnew v. Moody) What we stated in that
19 case is appropriate in the present
20 setting and we adhere to the position
21 taken there. Id., at 223.

22 In Carrigan v. California State Legislature, (9th
23 Cir. 1959), 263 F.2d 560, the District Court was presented
24 with a one hundred eighty-eight page Complaint attacking
25 provisions of the California Workmen's Compensation system.
26 Again, the Ninth Circuit upheld the dismissal, citing Rule
27 8(a) and Rule 8(e). See also Lowery v. Hauk, (C.D. Ca. 1976)
28 422 F.Supp. 490; Bouski v. Stewart, (S.D.N.Y. 1974) 381 F.
29 Supp. 529; and Liezzi v. Berzak, (S.D.N.Y. 1972) 57 F.R.D. 149.

30 The Amended Complaint presently before the Court
31 consists of two hundred ninety-one pages.^{1/} Webster's New
32 Collegiate Dictionary defines the term short as "having little
length". A Complaint of two hundred ninety-one pages has
substantial length and should be dismissed for that reason
alone. Such a dismissal is supported by Agnew, Corcoran,
and Carrigan (supra).

The Amended Complaint also appears to include
within each cause of action several legal theories. Virtually

^{1/} Although the last page is not numbered 291, there are
several instances of sub-pages (e.g., 7, 7a, 7b, etc).

1 every cause of action expressly refers to the Civil Rights
2 Act (28 U.S.C. § 1343, 42 U.S.C. § 1981 et seq.), the Federal
3 Tort Claims Act (28 U.S.C. §§ 1346(b), 2671 et seq.),
4 intentional torts, and violations of the First, Fourth,
5 Fifth, Sixth, Seventh, and Fourteenth Amendments to the
6 Constitution of the United States. These causes of actions
7 are at various times coupled with allegations of violations
8 of the Constitution of the State of California, the Sherman
9 Antitrust Act, the Clayton Act, the "Federal Election Campaign
10 Law and Act" and the California Public Utilities Act.^{2/}

11 Webster's New Collegiate Dictionary has defined the
12 term "plain" as "free of extraneous matter" and as "not
13 complicated". Clearly, any pleading that combines several
14 legal theories in a single cause of action is complicated
15 and contains extraneous matter.^{3/}

16 The pleading involved here places the burden upon
17 the defendants of determining which factual allegation
18 applies to which legal theory. The complex and confusing
19 combination of numerous legal theories has rendered a proper
20 analysis by the defendants impossible. Therefore, the
21 Amended Complaint should be dismissed for failure to present
22 a "plain" pleading.

23 The Amended Complaint is also repetitive. The
24 matters addressed in the First Cause of Action through
25 the Twenty-second Cause of Action are repeated virtually
26

27 ^{2/} In addition, virtually every cause of action incorpor-
28 ates by reference ". . . all allegations set forth
29 in all causes of action herein, hereinbefore and herein-
after complained of . . ." (see for example Third
Cause of Action, et seq.).

30 ^{3/} An example of the type of extraneous matter included
31 within the Amended Complaint may be seen at page 273c.
32 When seventy-five causes of action combine numerous
legal theories within each cause of action, the matter
is further complicated.

1 verbatim in the Thirtieth Causes of Action through the
2 Fifty-Second Cause of Action. In a few of these causes
3 of action the grammar is slightly altered, however, there
4 are no substantive alterations. Such repetition is contrary
5 to the requirement in F.R.Civ.P. 8(e) of a "concise" pleading.

6 In addition to the matters raised above, the
7 Amended Complaint is interwoven with allegations of conspiracy,
8 John Doe allegations and incorporations by reference. As
9 a result, it is impossible to determine which defendants
10 are intended to be included in the following Causes of
11 Action.

12 1) Causes of actions that allege conspiracies among
13 defendants or refer to ". . . defendants and each of them
14 . . .".^{4/} First, Second, Fifth, Sixth, Eighth, Ninth,
15 Twelfth, Thirteenth, Fourteenth, Fifteenth, Seventeenth,
16 Eighteenth, Nineteenth, Twentieth, Twenty-first, Twenty-
17 second, Twenty-third, Twenty-fifth, Twenty-seventh, Twenty-
18 eighth, Twenty-ninth, Thirtieth, Thirty-first, Thirty-fourth,
19 Thirty-fifth, Thirty-seventh, Thirty-eighth, Forty-first,
20 Forty-second, Forty-third, Forty-fourth, Forty-sixth, Forty-
21 seventh, Forty-eighth, Forty-ninth, Fiftieth, Fifty-first,
22 Fifty-ninth, Sixty-sixth, Seventh-third, Seventy-fourth and
23 Seventh-fifth.

24 2) Causes of actions that allege acts by John Does:^{5/}
25 Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, Twelfth,
26

27 ^{4/} The defendants have not included conspiracy allegations
28 that cite acts of ". . . said defendants . . .". Rather
29 the defendants only include allegations directed to
30 ". . . defendants . . ." or ". . . defendants and each
31 of them . . .".

32 ^{5/} "Doe" allegations are an improper means of naming
defendants. Wiltsie v. California Department of
Corrections, (9th Cir. 1968) 406 F.2d 515; Tolefree
v. Ritz (9th Cir. 1967) 382 F.2d 566.

1 Thirteenth, Fourteenth, Fifteenth, Sixteenth, Seventeenth,
2 Eighteenth, Nineteenth, Twentieth, Twenty-first, Twenty-
3 second, Twenty-third, Twenty-fourth, Twenty-fifth, Twenty-
4 seventh, Twenty-ninth, Thirty-fourth, Thirty-fifth, Thirty-
5 sixth, Thirty-seventh, Thirty-eighth, Thirty-ninth, Forty-
6 first, Forty-second, Forty-third, Forty-fourth, Forty-fifth,
7 Forty-sixth, Forty-seventh, Forty-eighth, Forty-ninth,
8 Fiftieth, Fifty-first, Sixty-third, Sixty-fifth, Sixty-sixth,
9 Sixty-seventh, Sixty-ninth, Seventieth, Seventy-second,
10 Seventy-fourth and Seventy-fifth.

11 With the John Doe allegations, conspiratorial
12 allegations, references to "defendants" or "defendants and
13 each of them" and allegations that incorporate by reference
14 ". . . all allegations set forth in all causes of actions
15 herein, hereinbefore and hereinafter complained of . . ."
16 the Amended Complaint is neither "short" nor "plain" as
17 required by F.R.Civ.P. § 8(a). Moreover, the Amended Complaint
18 is not simple, concise, and direct, as required by F.R.Civ.P.
19 § 8(e). Therefore, it is respectfully requested that the
20 Court dismiss plaintiff's Amended Complaint for failure to
21 comply with Rule 8 of the Federal Rules of Civil Procedure.

22 B

23 THE AMENDED COMPLAINT DOES NOT
24 COMPLY WITH F.R.CIV.P. 10(b)

25 In addition to F.R.Civ.P. 8, this Motion to Dismiss
26 is premised upon F.R.Civ.P. 10(b). That rule states that

27 Each claim founded upon a separate trans-
28 action or occurrence . . . shall be stated
29 in a separate count or defense whenever
30 separation facilitates the clear presenta-
31 tion of the matters set forth. (Emphasis
32 added)

30 Rule 10(b) was discussed in Barnard v. Pennsylvania
31 Range Boiler Company, (E.D. PA 1962) 32 F.R.D. 58. There,
32 plaintiff combined, within a single cause of action, claims

1 based upon negligence and breach of warranty. Defendant
2 moved to dismiss based upon rules 8 and 10 of the Federal
3 Rules of Civil Procedure. In response to the rule 10(b)
4 assertion, the court stated

5 Plaintiff's Complaint does not conform to
6 this rule. Even a cursory reading of the
7 disputed averments in paragraphs 6 and 7
8 show a haphazard intermingling of negligence
9 allegations with breach of warranty claims.
10 This makes it extremely difficult if not
11 impossible for each of these four defendants
12 to answer this Complaint. Some may be only
13 guilty of negligence and others may be only
14 guilty of breach of warranty. This plead-
15 ing is not within the spirit and intent of
16 F.R.Civ.P. 10(b).

17 As discussed above the Amended Complaint includes
18 numerous claims and numerous defendants within each cause
19 of action. Defendants are thus left with the impossible
20 burden of having to guess which claims apply to which defen-
21 dants under which set of facts. For this reason, and those
22 stated above, it is respectfully requested that plaintiff's
23 Amended Complaint be dismissed.

24 II

25 IT CANNOT BE DETERMINED WHETHER
26 VENUE FOR THE ALLEGED ACTS RESTS
27 IN THE EASTERN DISTRICT OF CALIFORNIA

28 In addition to the matters discussed above,
29 defendants Haig, Ruckelshaus, Kelley, Gray and Jaworski move
30 to dismiss the Amended Complaint on the ground that venue is
31 improper in the Eastern District of California.

32 Since the Amended Complaint presents a civil
action not based solely upon diversity jurisdiction, venue
is governed by 28 U.S.C. § 1391(b).

A civil action wherein jurisdiction is not
founded solely on diversity of citizenship
may be brought only in the judicial district
where all defendants reside, or in which
the claim arose, except as otherwise pro-
vided by law.

1 Plaintiff has not and cannot demonstrate that
2 any of the acts alleged against these defendants occurred
3 in California for the simple reason that all of these defen-
4 dants were in Washington D.C. Therefore, venue is improper
5 because it has not been brought in the district ". . . in
6 which the claim arose . . ." [28 U.S.C. § 1391(b)].
7 Moreover, plaintiff has not and cannot demonstrate that all
8 defendants reside in the Eastern District of California,
9 since each was served outside the State of California.
10 Thus, each of these defendants moves to dismiss the Amended
11 Complaint for lack of proper venue.

12 III

13 CALIFORNIA LACKS IN PERSONAM
14 JURISDICTION OVER DEFENDANTS
15 HAIG, RUCKELSHAUS, KELLEY,
GRAY AND JAWORSKI

16 Jurisdiction over the defendants may be asserted
17 in the United States District Court for the Eastern District
18 of California only if defendants Haig, Ruckelshaus, Kelley,
19 Gray and Jaworski have sufficient "minimal contacts" with
20 California to make the exercise of jurisdiction over the
21 parties "reasonable" and consistent with the requirements
22 of due process. International Shoe Co. v. Washington,
23 (1945), 326 U.S. 310; Dracor Shipping Corporation v. Union
24 Tank Car Company, (9th Cir. 1966), 361 F.2d 43; Kourkene
25 v. American BBR, Inc., (9th Cir. 1963), 313 F.2d 769;
26 L. D. Reeder Contractors of Arizona v. Higgins Industries,
27 Inc., (9th Cir. 1959), 265 F.2d 768; Le Vecke v. Griesedieck
28 Western Brewery Co., (9th Cir. 1956), 233 F.2d 772. The
29 burden of establishing sufficient contacts between the
30 state and the defendants, sufficient to justify service
31 of process and personal jurisdiction, is upon the plaintiff.
32 Moreover, plaintiff's evidence must be in the form of

1 probative facts. The allegations appearing in the Amended
2 Complaint are not sufficient and the trial court is not
3 bound by the pleadings. Taylor v. Portland Paramount
4 Corporation, (9th Cir. 1967), 383 F.2d 634; Tiffany Records,
5 Inc. v. M. B. Krupp Distributors, Inc., (1969), 276 Cal.App.2d
6 610, 81 Cal.Rptr. 320;

7 In a motion of this type, plaintiffs
8 have the burden of establishing the
9 presence of the defendant they under-
take to sue. (citations omitted)

10 [W]here a defendant properly moves to
11 quash out of state service of process
12 for lack of jurisdiction, the burden of
13 proof is upon the plaintiff to establish
the facts of jurisdiction by a prepon-
derance of the evidence . . . (citations
omitted). Kesler v. Schetky Equipment Corp.,
(N.D. Cal. 1961), 200 F. Supp. 678, 779.

14 A

15 PLAINTIFF MUST ESTABLISH THAT
16 EACH PARTY HAS ENGAGED IN PUR-
17 POSEFUL ACTIVITY WITHIN THE
STATE OF CALIFORNIA

18 California standards for the imposition of juris-
19 diction over nonresident individuals are identical with
20 federal constitutional standards. California Code of Civil
21 Procedure, Section 410.10 provides that:

22 A court of this state may exercise
23 jurisdiction on any basis not incon-
24 sistent with the Constitution of this
state or of the United States.

25 Federal constitutional law regarding in personam
26 jurisdiction was developed in a series of United States
27 Supreme Court cases. In International Shoe Co. v. Washington
28 (1945), 326 U.S. 310, the Supreme Court developed what has
29 come to be known as the "minimum contacts" test:

30 Whether due process is satisfied must
31 depend rather upon the quality and nature
32 of the activity in relation to the fair
and orderly administration of the laws
which it was the purpose of the due pro-
cess clause to insure. That clause does

1 not contemplate that a state may make
2 binding a judgment in personam against
3 an individual or corporate defendant with
4 which the state has no contacts, ties, or
5 relations. Id., at 319.

6 In International Shoe, the Court found that the
7 defendant had regularly, systematically and continuously
8 solicited orders in the forum state through salesmen re-
9 siding within the state, that these activities were "neither
10 irregular nor casual", that these efforts resulted in a
11 substantial volume of interstate business, and that, in
12 effect, the defendant had sought and received the benefits
13 and protections of the forum state. In addition, the obliga-
14 tion sued upon arose out of these very activities. All of
15 these factors are entirely lacking with respect to defendnats
16 Haig, Ruckelshaus, Kelley, Gray and Jaworski.

17 In Hanson v. Denckla, (1958), 357 U.S. 235, the
18 Supreme Court, after noting the trend of expanding personal
19 jurisdiction over nonresidents, stated:

20 But it is a mistake to assume that this
21 trend heralds the eventual demise of all
22 restrictions on the personal jurisdiction
23 of state courts. See Vanderbilt v. Vander-
24 bilt, 354 U.S. 416, 418, 1 L.Ed.2d 1456,
25 1459, 77 S.Ct. 1369. Those restrictions
26 are more than a guarantee of immunity from
27 inconvenient or distant litigation. They
28 are a consequence of territorial limita-
29 tions on the power of the respective States.
30 However minimal the burden of defending in
31 a foreign tribunal, a defendant may not be
32 called upon to do so unless he has had the
'minimal contacts' with that State that
are a prerequisite to its exercise of
power over him. See International Shoe
Co. v. Washington, 326 U.S. 310, 319, 90
L.Ed. 95, 103, 66 S.Ct. 154, 161 ALR 1057.

* * *

The unilateral activity of those who claim
some relationship with a nonresident defen-
dant cannot satisfy the requirement of
contact with the forum State. The applica-
tion of that rule will vary with the quality
and nature of the defendant's activity,

1 but it is essential in each case that there
2 be some act by which the defendant purpose-
3 fully avails itself of the privilege of
4 conducting activities within the forum
5 State, thus invoking the benefits and pro-
6 tections of its laws. (Emphasis added)
7 Hanson v. Denckla, 357 U.S. 235, 251-253

8 B

9 DEFENDANTS' ACTIVITY IN CALIFORNIA
10 DOES NOT JUSTIFY EXERCISE OF IN
11 PERSONAM JURISDICTION

12 The issue presently before this Court is whether
13 personal jurisdiction may be exercised over a nonresident
14 federal government official. In Kipperman v. McCone, (N.D.
15 Cal.) 422 F.Supp 860, the concepts announced in International
16 Shoe and CCP 410.10 were given application to the case at bar.
17 There, nonresident federal officials were charged with
18 illegally opening plaintiff's mail in New York. Plaintiff,
19 who brought suit in San Francisco, contended that in personam
20 jurisdiction existed in California since a similar mail
21 intercept program occurred in San Francisco. The court
22 stated,

23 The Court also rejects the contention
24 that the operation of the CIA's West
25 Coast Mail Intercept in San Francisco
26 for several two to three week periods
27 during 1969, 1970 and 1971 supply it
28 with jurisdiction over the nonresident
29 defendants. Id. at 873

30 * * *

31 Thus, in the final analysis, plaintiff
32 cannot identify any act committed in
this state by any of the nonresident
defendants which is substantially re-
lated to the alleged interception of
her mail to or from the Soviet Union
in New York. Id., at 874.

33 In the present case, plaintiff simply cannot identify
34 any acts of defendants Haig, Ruckelshaus, Gray, Kelley or
35 Jaworski that are sufficient to justify in personam juris-
36 diction in California. As a result, the burden of proving
37 sufficient contacts to justify jurisdiction has not and
38 cannot be met.

IV

A FEDERAL OFFICIAL CANNOT BE
HELD PERSONALLY LIABLE UNDER
A VICARIOUS LIABILITY THEORY

It remains unclear whether plaintiff has named various defendants in their official or individual capacities. To the extent that the Amended Complaint might be construed to seek personal liability of a federal official for the acts of employees of a governmental agency, it is defective.

In Sportique Fashions, Inc. v. Sullivan, (N.C. Cal. 1976) 421 F.Supp. 302 plaintiff sought personal recovery from several postal officials for late or non-delivery of advertising materials. Upon challenge by the defendants, the Court stated

No defendant herein may be held liable under a theory of vicarious liability for the acts of subordinates or other employees in the Postal Service.
(Citations omitted) Id. , at 306.

The issue of vicarious liability with respect to constitutional violations was treated in Kite v. Kelley, (10th Cir. 1976) 546 F.2d 334. The Court stated

The question then is whether a federal officer may be held monetarily liable for acts of his subordinates resulting in the deprivation of constitutional rights.

* * *

On the assumption that (plaintiff) was deprived of some constitutional right, he nevertheless may not recover from any of the defendants on the doctrine of respondent superior. Id. at 337.

Thus, in the present case, plaintiff may not recover damages from an individual federal official for the acts of subordinates. To the extent that the Amended Complaint seeks such recovery, it is improper.

////////

1 Thus, for each of the foregoing reasons, it is
2 respectfully requested that the Amended Complaint in this
3 matter be dismissed.

4 DATE: July 31, 1978

5 HERMAN SILLAS
6 United States Attorney

7 *James S. Joiner*
8 _____
9 JAMES S. JOINER
 Assistant U. S. Attorney

CERTIFICATE OF SERVICE BY MAIL

GEORGE A. BRONSON,)
Plaintiff,)
v.)
THE UNITED STATES OF)
AMERICA, et al.,)
Defendants.)

CIVIL NO. S-76-447-PCW

The undersigned hereby certifies that she is an employee in the
Office of the United States Attorney for the Eastern District
of California and is a person of such age and discretion
as to be competent to serve papers.

That on July 31, 1978 she served a copy of the attached
NOTICE OF MOTION AND MOTION TO DISMISS

by placing said copy in a postpaid envelope addressed to the person(s)
hereinafter named, at the place(s) and address(es) stated below, which
is/are the last known address(es), and by depositing said envelope and
contents in the United States Mail at Sacramento, California.

George A. Bronson
P. O. Box 588
Sacramento, CA 95804

Diepenbrock, Wulff, Plant & Hannegan
455 Capitol Mall, Suite 800
Sacramento, CA 95814

Darryl Doke, Esq.
Deputy Attorney General
State of California
555 Capitol Mall, Suite 350
Sacramento, CA 95814

John H. Larson, Co. Counsel
County of Los Angeles
648 Hall of Administration
500 West Temple Street
Los Angeles, CA 90012

Westley & Callahan
300 University Avenue
Suite 207
Sacramento, CA 95825

Bolling, Pothoven, Walter & Gawthrop
555 University Avenue
Sacramento, CA 95825

Gibson, Dunn & Crutcher
515 South Flower Street
Los Angeles, CA 90071

Vantassell, Fornasero & Vantassell
917 G Street
Sacramento, CA 95814

Ramsey, Scott & Morrison
800 Ninth Street
Sacramento, CA 95814

Burt Pines, City Attorney
City of Los Angeles
1700 City Hall East
200 North Main Street
Los Angeles, CA 90012

Downey, Brand, Seymour & Rower
555 Capitol Mall, Suite 1050
Sacramento, CA 95814


FLORENCE HENKEMEYER